APPENDIX P-1

COMMENTS RECEIVED ON THE DRAFT SUPPLEMENT TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

This appendix includes all agency, organization and individual comments that were received during the public comment period on the Draft Supplement to the Final Environmental Impact Statement (SEIS). All responses to comments are provided in Appendix Q-1, FAA Response To Comments On The Draft Supplement To The Final Environmental Impact Statement.
APPENDIX P-1
COMMENTS RECEIVED ON THE DRAFT SUPPLEMENT TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

HOW TO USE APPENDIX P-1, COMMENTS RECEIVED ON THE DRAFT SUPPLEMENT TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT AND APPENDIX Q-1, FAA RESPONSE TO COMMENTS ON THE DRAFT SUPPLEMENT TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT

This appendix includes all agency, organization and individual comments that were received during the public comment period on the Draft Supplement to the Final Environmental Impact Statement (SEIS). All responses to comments are provided in Appendix Q-1.

Within each comment letter or oral statement from the public hearing, brackets are used to identify the specific items commented on within each comment letter or oral statement. The bracketed comments in each letter are labeled by number to provide an identifier for each comment. Comments were organized into 11 topical categories as follows:

<table>
<thead>
<tr>
<th>Comment Topic</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Don't agree with FAA finding</td>
</tr>
<tr>
<td>2</td>
<td>General Support of the FAA's Preferred Alternative</td>
</tr>
<tr>
<td>3</td>
<td>General</td>
</tr>
<tr>
<td>4</td>
<td>Alternatives</td>
</tr>
<tr>
<td>5</td>
<td>Historic Resources</td>
</tr>
<tr>
<td>6</td>
<td>Public Service Demands</td>
</tr>
<tr>
<td>7</td>
<td>Wetlands</td>
</tr>
<tr>
<td>8</td>
<td>Floodplains</td>
</tr>
<tr>
<td>9</td>
<td>Noise</td>
</tr>
<tr>
<td>10</td>
<td>Air Quality</td>
</tr>
<tr>
<td>11</td>
<td>Hazardous Materials</td>
</tr>
</tbody>
</table>

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

For example, Comment 1.1 was “Stated general opposition to the FAA’s Preferred Alternative” The issue was commented on by two individuals, including Dowling and Eakle. In every letter, this comment is identified as Comment 1.1 and is addressed in Appendix Q-1, FAA Response to Comments on the Draft Supplement to the Final EIS.
A total of ten separate comment letters were received during the public comment period from July 19, 2019 to September 6, 2019. The total number of commenters was more than ten as two written comment letters were signed by more than one commenter. Additionally, a public hearing was held on August 22, 2019 during which the public was given the opportunity to comment on the Draft SEIS. Six members of the public made oral statements during the hearing. Comments were received from Federal, State, and local agencies, organizations, and individuals.

Readers interested in all responses to public comments can review Appendix Q-1, FAA Response To Comments Received On The Draft Supplement To The Final Environmental Impact Statement in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Appendix Q-1, FAA Response To Comments Received On The Draft Supplement To The Final Environmental Impact Statement for responses to all comments received from a specific commenter in the order they were made in the commenter’s letter.
### Table 1
**INDEX OF COMMENTS RECEIVED ON THE DRAFT SEIS**
*Gnoss Field Airport*

<table>
<thead>
<tr>
<th>NAME</th>
<th>ORGANIZATION (IF ANY)</th>
<th>DATE</th>
<th>COMMENT NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Stokley</td>
<td>Advisory Council on Historic Preservation (ACHP)</td>
<td>7/31/2019</td>
<td>5.1</td>
</tr>
<tr>
<td>Holly Dowling</td>
<td>N/A</td>
<td>9/3/2019</td>
<td>1.1, 1.2, 4.1, 3.1, 7.5</td>
</tr>
<tr>
<td>Sheila Eakle</td>
<td>N/A</td>
<td>8/19/2019</td>
<td>1.1, 1.3, 7.5, 4.1</td>
</tr>
<tr>
<td>George Blackburn</td>
<td>Federal Emergency Management Agency (FEMA)</td>
<td>7/15/2019</td>
<td>8.1, 8.2, 8.3, 8.4, 8.5, 8.6</td>
</tr>
<tr>
<td>Linda J. Novy and Susan Stompe</td>
<td>Marin Conservation League</td>
<td>8/26/2019</td>
<td>2.1, 7.1, 7.2</td>
</tr>
<tr>
<td>Rocky Vogler</td>
<td>North Marin Water District</td>
<td>7/29/2019</td>
<td>6.1</td>
</tr>
<tr>
<td>Ron and Dee</td>
<td>N/A</td>
<td>7/18/2019</td>
<td>2.1</td>
</tr>
<tr>
<td>James C. Mazza</td>
<td>U.S. Army Corps of Engineers (USACOE)</td>
<td>9/5/2019</td>
<td>7.6</td>
</tr>
<tr>
<td>Cornell Dunning</td>
<td>United States Environmental Protection Agency (USEPA)</td>
<td>9/5/2019</td>
<td>2.4, 7.7, 8.7, 10.1, 10.2, 11.1, 3.2</td>
</tr>
<tr>
<td>Christopher Gilkerson and Susan Mathews, Steve and Sharon Nebb, Michael Morris and Vickie Hecht, Duncan and Betsy Ross, Michael and Susan Parnes, Susan and Richard Markx, Jory Bergman, Robert and Georgina Shaw, Eric and Heather Gahan, Lisa and Terry Tuscher, Catherine and John Yee, Michael F. Ring and Jacqueline A. Bonner, Dave and Kris Donadio, Sandy and Ed Hoeffler, Jean Harris-Johnson</td>
<td>N/A</td>
<td>9/6/2019</td>
<td>2.1, 4.2</td>
</tr>
<tr>
<td>Barbara Salzeman</td>
<td>Marin Audubon Society</td>
<td>8/22/2019</td>
<td>2.4, 7.3, 2.1</td>
</tr>
<tr>
<td>Rosalie Webb</td>
<td>Black Point Environmental Action Committee</td>
<td>8/22/2019</td>
<td>9.1</td>
</tr>
<tr>
<td>Christopher Gilkerson</td>
<td>Rush Creek Neighborhood</td>
<td>8/22/2019</td>
<td>2.1, 2.4, 2.3, 9.1, 2.1, 2.4, 4.2</td>
</tr>
<tr>
<td>Gabriella Fiazies</td>
<td>N/A</td>
<td>8/22/2019</td>
<td>1.3</td>
</tr>
<tr>
<td>Susan Stompe</td>
<td>Marin Conservation League</td>
<td>8/22/2019</td>
<td>2.1, 7.4</td>
</tr>
<tr>
<td>Larry Kivett</td>
<td>N/A</td>
<td>8/22/2019</td>
<td>1.3</td>
</tr>
</tbody>
</table>
THIS PAGE INTENTIONALLY LEFT BLANK
Dear Mr. Pomeroy,

The Advisory Council on Historic Preservation (ACHP) received your letter notifying our agency of the availability of the Draft Supplement to the Final Environmental Impact Statement (Draft SEIS).

The Federal Aviation Administration (FAA) should be coordinating with the California State Historic Preservation Officer (SHPO), Indian tribes, and other consulting parties with an interest in historic properties in order to identify historic properties as part of National Environmental Policy Act (NEPA) and in order to ensure compliance with Section 106 of the National Historic Preservation Act (NHPA). The FAA should initiate the Section 106 process by notifying the CA SHPO and other consulting parties pursuant to our regulations, “Protection of Historic Properties” (36 CFR Part 800). Through early consultation the agencies will be able to determine the appropriate strategy to ensure Section 106 compliance for this undertaking. FAA should continue consultation with the SHPO and other consulting parties to identify and evaluate historic properties within the project’s area of potential effect and to assess any potential adverse effects. If you determine, through consultation with the consulting parties, that the undertaking will adversely affect historic properties, or that the development of an agreement document is necessary, FAA must notify the ACHP and provide the documentation detailed at 36 CFR § 800.11(e).

Should you have any questions regarding compliance with the requirements of Section 106, you may contact me at 202-517-0224 or by e-mail at sstokely@achp.gov.

Thank you,

Sarah Stokely

Sarah C. Stokely
Program Analyst
Advisory Council on Historic Preservation
Telephone: 202-517-0224
Fax: 202-517-6381
Email: sstokely@achp.gov

Register now for the ACHP’s all-new Section 106 classroom training courses in 2019!
Dear Mr. Pomeroy,

I am writing to endorse Option A; no change for the runway extension at Gnoss Field in Novato, California. The extension of the runway has been a twenty year desire that is a project in search of a reason. The FAA report and recommendation of a 300 foot extension will create very little change and will involve very real costs and environmental damage.

The critical class of plane that this project aims to help comprises less than 1% of the planes that use Gnoss Field, in all just six planes. This type of plane has been using this field for the last twenty years and would likely do so without the extension. The drawback for these planes is almost theoretical, as they are limited on the rare very hot day from maximum fuel and baggage loading. This drawback can be mitigated by flying earlier or later in the day when the weather is cooler, or by reducing their weight, which is how it has been working all these years. If these planes must fly fully loaded on a hot day, Petaluma Airport, with a runway of 3600 ft. is just a few miles away.

Over the years, Gnoss Field has experienced very limited growth in the number of planes that are based there. Of those planes, 99% of users are not negatively impacted by the current runway length. And some have voiced opposition to the potential loss of runway use if the extension project goes forward. This occurred during the recent runway resurfacing, which went over budget by 39% after encountering asbestos-laden serpentine rock. The airfield was closed for a period of time and rent reductions ensued.

Instead of lengthening the runway, the FAA funds would be better spent on levee maintenance, as the field is basically at sea level. Back-up power sources to keep the pumps running during power outages is also a good use of funds.

The expenditure of millions of dollars to extend the runway to benefit a handful of plane owners is a bad use of taxpayer dollars. In addition, the loss of wetlands, even if mitigated, is another reason the meager benefits of the extension are not justified.

Thank you for your consideration.

Sincerely,
Gary Dowling

2481 Vineyard Rd.
Novato, CA 94947
August 19, 2019

Mr. Doug Pomeroy  
Environmental Protection Specialist  
SFO-ADO612 Federal Aviation Administration  
SF Airports District Office  
1000 Marina Blvd.  
Brisbane, Ca. 94005-1835

Dear Mr. Pomeroy,

As a 60 year resident of Novato, I am opposed to the current plan under consideration to extend the runway length of Gnoss Field.

I lived here while Hamilton was an active airfield and while the plan for Gnoss is not of the same scope, the inherent problems are the same. A longer runway translates into the capability to service larger planes, emitting more pollution and creating more noise. I can't imagine this positively impacting the surrounding wetlands or the habitat residing there.

There is also the very real possibility that the lengthening of the runway once will only open the door to further extensions and more of the negative aspects mentioned above. Santa Rosa is only 30 miles away and is equipped to accommodate larger aircraft. Let's leave well enough alone.

Sincerely,

Sheila Eakle  
2 Santa Victoria Ct.  
Novato, Ca. 94945
July 15, 2019

Doug Pomeroy, Environmental Protection Specialist SFO-ADO 612
Federal Aviation Administration, San Francisco Airports District Office
1000 Marina Boulevard
Brisbane, California 94005-1835

Dear Mr. Pomeroy:

This is in response to your request for comments regarding request for comments regarding the Notice of Availability of the Draft Supplement to the Final Environmental Impact Statement and Notice of Public Hearing – Gnoss Field Airport- Proposed Extension of Runway 13/31, Novato, Marin County, California.

Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands) require all Federal agencies “to avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of the floodplains/wetlands and to avoid direct or indirect support of floodplains/wetland development wherever there is a practicable alternative.” Federal agencies are responsible for implementing Executive Orders (EO) through their own regulations. The EO states that, at a minimum, Federal agencies must comply with National Flood Insurance Program (NFIP) regulations.

The requirements for environmental considerations are found in Vol. 44 Code of Federal Regulations (44 CFR), Part 9 Floodplain Management and Protection of Wetlands, and part 10 Environmental Considerations. These regulations set forth the policy, procedures, and responsibilities to implement and enforce EO 11988 and 11990. The minimum floodplain management building requirements of the NFIP are described in 44 CFR, Section 60.3.

Please review the current effective Flood Insurance Rate Maps (FIRM) for the City of Novato (Community Number 060178), Maps revised March 16, 2016 and Marin County (Community Number 060173), Maps revised August 15, 2017 for land that has been mapped with high, moderate and low flood risks.
A summary of the National Flood Insurance Program floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRM), must be elevated on piliers and columns, so that the lowest horizontal structural member, (excluding the piliers and columns), is elevated to or above the base flood elevation level. In addition, the posts and piliers foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtml.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. They do this for many reasons, one of the biggest is to account for risk and uncertainty in order to protect their communities from larger than predicted flood events. FEMA strongly advises you to contact and work with the local community’s floodplain manager for more information on local floodplain management building requirements which could be incorporated into your project and provide added levels of protection. The Novato floodplain manager can be reached by contacting Russell Thompson, Public Works Director, at (415) 899-8246. The Novato floodplain manager can be reached by contacting Berenice Davidson, Principal Civil Engineer, Public Works Department, at (415) 473-3770.
Doug Pomeroy, Environmental Protection Specialist
Page 3
July 15, 2019

If you have any questions or concerns, please do not hesitate to contact Michael Hornick at (510) 627-7260 or any of my staff who can provide your agency with floodplain management technical expertise and guidance.

Sincerely,

[Signature]

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

cc:
Russell Thompson, Public Works Director, City of Novato
Berenice Davidson, Principal Civil Engineer, Department of Public Works, Marin County
Ray Lee, WREA, State of California, Department of Water Resources, North Central Region Office
Michael Hornick, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX
August 26, 2019

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

Re: Gnoss Field Supplement to the Environmental Impact Statement (EIS)

Dear Mr. Pomeroy:

The Marin Conservation League (MCL) has reviewed the recently released Supplement to the EIS on Gnoss Field which addresses the new alternative runway extension of 300 feet. We are pleased that this evaluation took place and the shorter expansion addressed the Purpose and Need.

We recognize that the 300 foot extension will be 406 feet when the 106 feet at the south end of the existing runway is closed off and added to the northerly expansion. We are pleased that less of the valuable seasonal wetland around the airfield will be destroyed. We remain hopeful that the mitigation for those wetlands lost will take place in Marin. We support increasing the ratio of compensation to loss to more closely replicate the county standard.

This project has been under consideration for a couple decades now. We appreciate that FAA considered.

MCL’s and others’ concerns and decided on an alternative that addresses both the purpose and need and also preserves more wetlands.

Thank you,

Linda J. Novy  
President, Marin Conservation League

Susan Stompe  
Chair, MCL’s Land Use & Transportation Committee

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.
Doug Pomeroy  
Environmental Protection Specialist  
SFO-ADO 612  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Blvd.  
Brisbane, CA 94005-1835

RE: Notice of Availability of the Draft Supplement to the FEIS and Notice of Public Hearing, Gnoss Field Airport – Propose Extension of Runway 13/31, Novato, Marin County, California

Dear Mr. Pomeroy:

North Marin Water District is in receipt of the letter from your office dated July 8, 2019 outlining project alternatives for the extension of Runway 13/31 at Gnoss Field Airport in Novato, California. The proposed project may have potential impact to North Marin Water District facilities depending on the alternative selected.

If you have questions regarding this matter, I can be reached at 415-761-8945 or rvogler@nmwd.com.

Sincerely,

Rocky Vogler  
Chief Engineer
Pomeroy, Douglas (FAA)

From: Rondee <Rondee1944@msn.com>
Sent: Thursday, July 18, 2019 3:56 PM
To: Pomeroy, Douglas (FAA)
Subject: GNOSS FIELD

2.1 Approve the 300 foot extension now and later extend it more. It would be for safety and the run way could be used in case of emergencies to help serve the bay area.

Ron & Dee

Sent from Mail for Windows 10
Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835  

Subject: Draft Supplemental Environmental Impact Statement (DSEIS), Gnoss Field (DVO)  
Airport Proposed Extension of Runway 13/31, Marin County, California  
(EIS No. 20190163)

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 and Final Environmental Impact Statements (DEIS) and provided comments to the Federal Aviation Administration on February 6, 2012 and August 4, 2014, respectively. Our comments expressed concerns regarding the fill of 12 acres of wetlands and the loss of 23 acres of wildlife habitat, and we recommended a shorter runway extension be evaluated to meet the purpose and need while reducing impacts. Since completion of the June 2014 Final EIS, the FAA determined that the critical aircraft at Gnoss Field had changed and the necessary runway extension required for its operation was 300-feet. The Draft SEIS evaluates the reduced runway extension as Alternative E, FAA’s preferred alternative, which has reduced wildlife habitat losses and 5 fewer acres of wetlands impacted.

The project will require an individual Clean Water Act Section 404 permit, and the DSEIS has identified Alternative E as the least environmentally damaging practicable alternative (LEDDA). We appreciate FAA aligning the agency’s preferred alternative with the CWA Section 404 permit LEDDA, and coordinating the discussion of possible compensatory mitigation options for wetlands impacts for the NEPA analysis and for the future CWA Section 404 permitting. A full mitigation proposal that includes responsible parties for implementation and all the components identified in the Mitigation Rule (40 CFR Part 230, Subpart J) will be prepared at a future date and EPA is available to work with the project proponent and Army Corps of Engineers to further develop mitigation options during the CWA Section 404 permit phase.

Since the project would involve investment in infrastructure located in a floodplain, the project offers an opportunity to incorporate proactive mitigation to reduce risks posed by natural hazards including sea
level rise and floods. We recommend an evaluation of risk and discussion on how the project can incorporate mitigation elements. In addition, EPA has provided additional recommendations (attached) for assessing air quality impacts and addressing the potential for residual contamination on airport property.

Effective October 22, 2018, EPA no longer includes ratings in our comment letters. Information about this change and EPA’s continued roles and responsibilities in the review of federal actions can be found on our website at: https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act.

EPA appreciates the opportunity to review this DSEIS. When the FSEIS is released for public review, please send one electronic copy to the address above (mail code: TIP-2). If you have any questions, please contact me at (415) 947-4161, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Connell Dunning, Acting Manager
Environmental Review Branch

Enclosures: EPA’s Detailed Comments

cc: Sahrye Cohen, Army Corps of Engineers
    Michael Hornick, Federal Emergency Management Agency
    Reuel Brady, Marin County Department of Public Works
    Elizabeth Morrison, Regional Water Quality Control Board
    Craig Weightman, California Department of Fish and Game
Wetlands Impacts/Clean Water Act Section 404 permit

The DSEIS addresses the requirements of the NEPA and the U.S. Army Corp of Engineers (Corps), Clean Water Act (CWA) Section 404 permitting process for impacts to waters of the United States and confirms that the Corps can only permit the least environmentally damaging practicable alternative (LEPDA). While we understand that the 2009 wetlands jurisdictional determination will be reverified during the CWA Section 404 permit process, we note that, based on the 2009 delineation, the new preferred alternative will impact approximately 4.8 fewer acres of wetlands than Alternative B. The initial compensatory mitigation overview provided in the DSEIS outlines feasible options that could ensure compliance with the CWA Section 404 compensatory mitigation rule. Available mitigation bank credits for tidal and brackish wetlands are scarce in the project area’s watershed and Marin County in general; thus, contributing in-lieu fees to more ‘shovel-ready’ restoration efforts within the San Pablo Bay watershed could result in achieving large regional ecosystem goals.

Recommendation: Continue to work with the Corps to develop suitable compensatory mitigation for impacts to waters of the United States that cannot be avoided. EPA is available for discussions with the applicant and the Corps to assist in identifying mitigation options.

Climate Change/Floodplain Impacts

EPA previously commented on climate change adaptation on the Draft and Final EIS, noting the need to discuss the potential for increased flooding during project planning given that the airport and project area are located in the 100-year floodplain. The DSEIS identifies a six-acre floodplain encroachment, deemed insignificant, and notes that the entire airport property would remain within the 100-year floodplain since the Gnoss Field (DVO) Airport levees do not meet FEMA 100-year flood protection standards (p. 5-202). The response to EPA’s prior comments dated February 2, 2012 noted that the runway extension project does not include providing flood protection for Gnoss Field Airport in either the short or long term because it was beyond the scope of the EIS and would be handled through other region-wide efforts. We understand the project proponent, the County of Marin, is not proposing project elements that would incorporate adaptive capacity. The proposed project will extend levees around the runway extension without upgrading them to meet FEMA 100-yr flood protection standards.

The Marin County Sea Level Rise Vulnerability Assessment identifies Gnoss Field as a vulnerable transportation asset that could expect long-term average high tide impacts. Under “15-year expectations” it states that storm surge flooding, especially combined with stormwater flooding, could impact North Novato at Gnoss Field, and in the long term it could expect more than ten feet of tidal floodwater. Planning for projects located in areas that will be substantially affected by climate change provides an opportunity to discuss a strategy to address climate change impacts. The recently released National Mitigation Investment Strategy, which included representatives from the Department of Transportation, aims to help the government improve disaster mitigation programs across federal agencies. The Investment Strategy encourages the whole community to invest in mitigation, pre- and post-disaster, by adopting the Investment Strategy’s shared goals. Goal 3: Make Mitigation Investment Standard Practice – encourages the community at large to factor mitigation into investment decisions,

2 https://www.fema.gov/national-mitigation-investment-strategy
especially for buildings and infrastructure, and emphasizes local leadership and building resilient communities.

**Recommendation:** EPA continues to recommend that the project incorporate adaptive capacity to address sea-level rise, storm surge, and increased flooding, consistent with the National Mitigation Investment Strategy. In the absence of adaptive capacity added through the proposed project, we recommend including a discussion in the Final SEIS describing a potential strategy to address climate change impacts including a discussion of the project’s tolerance for risk and a calculation of the number of years the project is likely to be useful before being impacted by flooding or inundation. Include in the discussion the identification of planning mechanisms and funding sources available for necessary upgrades, the parties who would be responsible for carrying out such improvements, and what type of mitigations could be implemented (i.e. creating a levee system to protect against the 100-year flood). Discuss any public health or safety impacts that could occur in the interim.

**Air Quality**
The air quality analysis concludes that impacts on air quality for all the action alternatives would not be significant (p. 5-69); however, it is not clear whether truck emissions from import of fill were included in the emissions estimates. Appendix F-1 states that “fill and aggregate rock material have been imported to DVO over the years to raise the elevation in preparation for construction of the runway and other facilities at DVO” but the DSEIS states that “Implementation of Alternative E would require additional fill be transported to DVO to construct the runway extension” (p. 427). The DSEIS estimates that 37,811 cubic yards of soil/fill would be needed for the Preferred Alternative E (Table 5.15-8), but Appendix F-1, page 36 states that the total estimated fill to be imported for future trenching activities for the levee realignment/extension for Alternative E, assuming a maximum disturbance of two feet, is estimated at 57,575 cubic yards.

**Recommendation:** Clarify whether truck emissions from importing fill material for the project have been included in the air emissions estimates. Update emissions estimates as necessary, using estimates from the nearest freeway if borrow sites have not yet been identified. Revise the Final EIS to correct the fill volume inconsistencies between the Appendix and the DSEIS.

**Residual Contamination**
The DSEIS indicates that there is residual contamination from prior removals of Underground Fuel Storage Tanks and the closure letter from the SF Regional Water Quality Control Board (RWQCB) indicates that there may be residual petroleum-contaminated soil and groundwater at this site that could pose an unacceptable risk in the event of future construction or redevelopment activities. The former fuel storage site is not within the direct impact area for Alternative E; however, it is advisable that contractors be prepared should any residual contamination be encountered. While no oil sheen or petroleum odors have been observed in the drainage ditches that enclose the runway (p. 6-16), this condition could change with surface and subsurface disruption.

**Recommendation:** As a precaution, include a mitigation measure that on-site personnel will be trained to recognize fuel contamination of ground and surface waters, should any unexpected

---

In general, large, infrastructure-intensive projects that are expected to last for many decades have a low tolerance for risk, and smaller, less complex projects, or those that are unlikely to last more than a decade or so, have a higher tolerance for risk.
residual contamination be encountered during construction, consistent with the RWQCB’s closure letter in Appendix L-1 that states “Contractors performing subsurface activities at the site should be prepared to encounter soil and groundwater contaminated with petroleum hydrocarbons, and any encountered pollution should be managed properly to avoid threats to human health or the environment. Proper management may include sampling, risk assessment, additional cleanup work, mitigation measures, or some combination of these tasks”.

Minor comment
Table 1-3 identifies the comments received on the original Draft EIS. In addition to the topics listed, EPA also commented on wetlands mitigation, floodplain/climate change effects, bird-aircraft strike/impacts to pilot safety, and noise, which are not reflected in Table 1-3 (p. 1-12). Please update this table if it is included in the Final EIS.
Regulatory Division

SUBJECT: File Number 2008-00293

Ms. Nardos Wills
c/o Mr. Douglas Pomeroy
Acting Manager, San Francisco Airports District Office
Federal Aviation Administration
1000 Marina Boulevard, Suite 220
Brisbane, California 94005

Dear Ms. Wills:

This is in response to your letter of August 14, 2019, concerning the Federal Aviation Administration’s (FAA) process of developing a Supplement to the Final Environmental Impact Statement (EIS) to evaluate the Proposed Extension of Runway 13/31 at Gnoss Field Airport, Marin County, California.

The FAA has invited the Corps to become a cooperating federal agency, under the National Environmental Protection Act (NEPA), in the development of the Supplement to the EIS. With this letter, the Corps hereby agrees to coordinate with the FAA as a cooperating agency, pursuant to 40 C.F.R. Section 1501.6(b) and 1508.5, 33 C.F.R. Part 325, Appendix B, paragraph 8(c), and 33 C.F.R. Section 230.16, to ensure that FAA’s resulting supplement may be adopted by the Corps to meet our regulatory authority under Section 404 of the Clean Water Act (33 U.S.C. Section 1344) and Section 10 of the Rivers and Harbors Act (33 U.S.C. Section 403).

The Corps agrees to assist FAA in preparing the supplement due to our jurisdiction over areas that could be affected by the proposed project and our expertise in the following:

- Identifying and delineating aquatic resources;
- Corps Regulatory Program regulations at 33 CFR Parts 320-332;
- Compliance with the Environmental Protection Agency’s (EPA) CWA Section 404(b)(1) Guidelines (40 C.F.R. Part 230); and
- Assessing the functions and services of aquatic resources and identifying appropriate methods to conduct such assessments.

Subject to availability of resources and in accordance with applicable laws and regulations, the Corps agrees to:

- Assist in identifying interest groups;
- Attend coordination meetings and joint field reviews;
- Raise concerns about any relevant technical studies that may be needed in supplement;
- 2 -

- Assist in developing the range of alternatives, including the “practicability” of such alternatives and evaluation criteria;
- Assist in identifying appropriate and practicable mitigation, including appropriate and practicable steps to first avoid and then minimize adverse impacts to aquatic resources, and then compensate for unavoidable adverse impacts remaining after all appropriate and practicable minimization has been incorporated;
- Identify issues, concerns, and any technical studies that the supplement should address to support the Corps in fulfilling its NEPA or other responsibilities and any other requirements per CWA Section 404; and
- Review administrative draft and final supplement

We look forward to continued dialogue and coordination with the FAA on this proposed project. You may refer any questions on this matter to Mr. Bryan Matsumoto of my staff by telephone at 415-503-6786 or by e-mail at bryan.t.matsumoto@usace.army.mil. All correspondence should be addressed to the Regulatory Division, North Branch, referencing the file number at the head of this letter.

Sincerely,

James C. Mazza
Acting Chief, Regulatory Division

Copies Furnished:

US EPA, San Francisco, CA
US FWS, Sacramento, CA
US NMFS, Santa Rosa, CA
CA DFW, Fairfield, CA
CA RWQCB, Oakland, CA
September 6, 2019

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

Via fax 650-827-7635 and email: douglas.pomeroy@faa.gov

Re: Supplement Final Environmental Impact Statement for Gnoss Field Airport Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

We appreciate this additional opportunity to provide our comments and views about the proposed project to extend the runway at Gnoss Field. As residents of the Rush Creek neighborhood, taxpayers and residents just south of the airport, we have a vested interest in the outcome. We appreciate the time and care that the FAA has taken to make sure that all voices are heard and the runway length analysis is technically accurate. For your reference and the record, we attach our last comment letter in this matter dated March 20, 2018. We will not repeat here all the points we previously made in that letter.

We reiterate our general support of the now twice-confirmed determination that the proper runway length extension should be no longer than 300 feet. In this regard, we support the FAA’s Alternative E, because it meets the identified purpose and need for the project, which is to match the runway length to current and reasonably projected usage. As we understand it, this is the only purpose that would qualify for the FAA matching grant. We do have a question as to why the Runway Safety Areas (“RSAs”) at each end of the runway would be 300 feet instead of 240 feet, which is what the County’s originally proposed project (knows as Alternative B) called for. Given that Alternative B’s purpose was to accommodate larger jets and a runway extension of 1,100 feet, it seems counter-intuitive that a shorter runway extension would require longer RSAs.

To be clear, we remain adamantly opposed to Marin County’s originally proposed Alternative B because:

- It would be inconsistent with an accurate runway length analysis (1,100 feet instead of the properly calculated 300 feet);
- It would have a much larger impact on the wetlands and wildlife;
- It would enable larger and noisier jets to use the uncontrolled air field with additional fly-overs of our homes and additional violations of the airport noise abatement procedures which negatively impact the property use and enjoyment of hundreds of Marin County residents and taxpayers and would increase the safety risk;
It would cost Marin County taxpayers over twice as much as the FAA's Alternative E.

With regard to this last point, we believe that the Marin County Board of Supervisors will still have a difficult decision whether to proceed even with Alternative E. The runway extension would only benefit a small number of pilots who own large planes. Despite what some commenters continue to claim, there is no evidence that a runway extension would increase tax revenue or contribute in any measurable way to Marin County's emergency preparedness. Those are the facts. Moreover, according to the July 16, 2019 Department of Public Works Report to the Marin County Board of Supervisors on Gnoss Field, even with the FAA grant the cost to the County would be some $2.5 million. And that does not include the airport's current $458,852 debt owed to the County's General Fund for its share of the cost overrun from the 2018 runway improvement project (basically general maintenance).

Obviously, it is not easy to expand and improve and maintain a runway that is built at sea-level in a marsh estuary tidal basin. Our elected officials will have to consider all of this, especially in light of sea-level rise and balanced against other important County needs.

We appreciate the FAA's and the Environmental Consultant's work on the EIS. Thank you for your consideration of our comments.

Very truly yours,

The undersigned residents of Rush Creek

<table>
<thead>
<tr>
<th>Christopher Gilkerson and Susan Mathews</th>
<th>Steve and Sharon Nebb</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michael Morris and Vickie Hecht</td>
<td>Duncan and Betsy Ross</td>
</tr>
<tr>
<td>Michael and Susan Parnes</td>
<td>Susan and Richard Markx</td>
</tr>
<tr>
<td>Jory Bergman</td>
<td>Robert and Georgina Shaw</td>
</tr>
<tr>
<td>Eric and Heather Gahan</td>
<td>Lisa and Terry Tuscher</td>
</tr>
<tr>
<td>Catherine and John Yee</td>
<td>Michael F. Ring and Jacqueline A. Bonner</td>
</tr>
<tr>
<td>Jeff and Leslie Belingheri</td>
<td>Dave and Kris Donadio</td>
</tr>
<tr>
<td>Sandy and Ed Hoeffer</td>
<td>Jean Harris-Johnson</td>
</tr>
</tbody>
</table>

cc: Supervisor Judy Arnold
    Supervisor Damon Connolly
    Supervisor Katie Rice
    Supervisor Dennis Rodoni
    Supervisor Kate Sears
    Raul Rojas, Director of Public Works
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: GNOSS 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 Gnoss 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 Gnoss 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

<table>
<thead>
<tr>
<th>Christopher Gilkerson and Susan Mathews</th>
<th>Steve and Sharon Nebb</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michael Morris and Vickie Hecht</td>
<td>Duncan and Betsy Ross</td>
</tr>
<tr>
<td>Michael and Susan Parnes</td>
<td>Susan and Richard Markx</td>
</tr>
<tr>
<td>Jory Bergman</td>
<td>Robert and Georgina Shaw</td>
</tr>
<tr>
<td>Eric and Heather Gahan</td>
<td>Lisa and Terry Tuscher</td>
</tr>
<tr>
<td>Chris and Lisa Free</td>
<td>Michael F. Ring and Jacqueline A. Bonner</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>Catherine and John Yee</td>
<td>Dave and Kris Donadio</td>
</tr>
<tr>
<td>Russell and Lisa Helfond</td>
<td>Katherine Walker</td>
</tr>
<tr>
<td>Melanie and Rob Walker</td>
<td>Frank Cioffi and Leza Danly</td>
</tr>
<tr>
<td>John Conway</td>
<td>Bob and Patty Hewett</td>
</tr>
<tr>
<td>John and Bambi Mengarelli</td>
<td>Sandy and Ed Hoeffer</td>
</tr>
<tr>
<td>Wanda Sarti</td>
<td>Matthew and Trisha Mauer</td>
</tr>
<tr>
<td>Matt and Jan Lennon</td>
<td></td>
</tr>
</tbody>
</table>

Cc: Supervisor Judy Arnold
    Supervisor Damon Connolly
    Supervisor Katie Rice
    Supervisor Dennis Rodoni
    Supervisor Kate Sears
    Raul Rojas, Director of Public Works
FEDERAL AVIATION ADMINISTRATION

In the Matter of:  

Draft Supplement to the  
Final Environmental Impact  
Statement  

Extend Runway 13/31  
Gnoss Field Airport  

PUBLIC HEARING

MARIN HUMANE SOCIETY AUDITORIUM  
171 BEL MARIN KEYS BOULEVARD  
NOVATO, CALIFORNIA

THURSDAY, AUGUST 22, 2019  
7:00 P.M.

Reported by:  
Gigi Lastra

California Reporting, LLC  
(510) 313-0610
APPEARANCES

HEARING OFFICER
Doug Pomeroy

STAFF
Rob Adams
Gabriela Elizondo

PUBLIC COMMENT
Barbara Salzman, Marin Audubon Society
Rosalie Webb, Black Point Environmental Action Committee
Christopher Gilkerson
Gabriella Fiazies
Susan Stompe, Marin Conservation League
Larry Kivett
PROCEEDINGS

7:03 P.M.

NOVATO, CALIFORNIA, THURSDAY, AUGUST 29, 2019

HEARING OFFICER POMEROY: Good evening. My name is Doug Pomeroy with the Federal Aviation Administration. Please pick out a seat to your liking and we’ll be starting the public hearing momentarily. Okay.

Again, my name is Doug Pomeroy. I welcome and thank you for coming to the public hearing regarding the draft supplement to the Final Environmental Impact Statement to extend Runway 13-31 at Gnoss Field Airport. I’m an Environmental Protection Specialist at the FAA’s Airport District Office in Brisbane, California, and I will be serving as your Hearing Officer tonight.

This is a public hearing held by the FAA to receive comments on the draft supplement to the Federal Environmental Impact Statement under the National Environmental Policy Act. This project is proposed by the owner and operator of Gnoss Field Airport, Marin County.

While this is an FAA public hearing to receive comments, there are several Marin County and other representatives here tonight that I wanted to recognize.

First, we have Amy Schroeder here and she is on the staff for Congressman Jared Huffman. We have Board of
Supervisors Representative Dennis Rodoni is here tonight.

I don’t know if any other elected officials snuck in on me who would like to be introduced. I don’t see any.

Then we also have several representatives from the Marin County Department of Public Works. We have Chief Assistant Director of the Marin County Department of Public Works, Craig Tackabery. And we have Marin County’s Project Manager for this Environmental Impact Statement and that is John Neville, wherever you are. John is sitting. And he works in Transportation Services for the Marin Department of Public Works.

In addition to myself, and I serve as the FAA’s Project Manager for the Environmental Impact Statement, we also have a couple representatives from the consulting firm that actually prepared the wrote the document, and that is Rob Adams, Project Manager for our environmental consulting company, Landrum & Brown, and Gabriella Elizondo, who’s in the back there, who’s the Assistant Project Manager for this document.

She’s particularly important tonight because if you are interested in speaking tonight, please fill out one of these comment forms.

Are we using the little one or the big one?

We’re using the little one. Fill it out and indicate to her and she will be coming around. You can just
hold up your hand after you fill it out, indicating that you
wish to speak tonight, and we’ll collect them all up.

We have a couple of short presentations that we’re
going to be doing. And after we do that, most of the
meeting is going to be devoted to listening to your comments
on the document.

If you’re just coming in now, we would ask that
you sign in at the back, please, if you’d like to do so, and
then find a nice seat.

Again, the purpose of our public meeting tonight
is twofold. One is to update you on the status of the
Environmental Impact Statement. And the primary reason of
the meeting tonight is the second one and that is to receive
your comments on the document.

I will be making a brief presentation, as will Rob
Adams of Landrum & Brown. And then we’ll be adjusting the
room a little bit, shifting the podium, and standing up to
listen to your comments.

As a reminder, we are here tonight to listen to
what you have to say and not to debate the details or the
merits or particular parts of the EIS. If there’s a short
factual question during your comments that you have, we’ll
try and answer it, but for everything else, we’re going to
listen, take it back and evaluate it and provide a response
in the Final Environmental Impact Statement.
Again, for those of you who came in late, if you would like to speak tonight, please fill out a speaker card and give it to Gabriella back there who will get it to us.

This is a flowchart regarding this EIS. I’m going to go over this briefly and then I’ll go into a little bit more detail about, as you can see, we’ve had a number of steps. The light brown steps are steps in our Environmental Impact Statement process. The darker brown steps are points where we had requested public involvement and public comments previously in this process.

The first brown step there, that was when we issued a Notice of Intent to prepare the EIS document. That was back in 2008. We held a public scoping meeting at that time. After that, we released a Draft Environmental Impact Statement in 2012. That was a joint -- or that was two companion documents. We issued the FAA’s Environmental Impact Statement and the County’s California Environmental Quality Act Environmental Impact Report at the same time.

For those of you coming in, we’d ask that you sign in. And if you are interested in speaking tonight, Gabriella can set you up with a speaker card.

After the Draft Environmental Impact Statement and Environmental Impact Report were issued, the federal government and Marin County separated out how the documents proceeded from that point. Marin County issued and
certified a Final EIR in February of 2014. The FAA issued a Final EIS in June of 2014. And we received comments and evaluations on that document that led us to, instead of issuing a decision on that document, do more analysis. And we initially identified that requirement with the County in early 2015.

After that time, we completed two working papers regarding the aviation activity at Gnoss Field Airport before we got to this step of preparing an additional document. The first of those papers was issued in 2016 and there was a public comment meeting on this. And then an updated second working paper which considered some of the comments that came from several different sources, many from the aviation community at Gnoss Field Airport, we prepared an updated working paper. And from those, we’ve now gone onto the EIS.

These next few slides are just going to reiterate what I’ve just said, but I know it’s been a process that’s taken some time, so I wanted to take a couple of minutes to take people through that.

Again, Final EIS in June 2014. Identified in January ’14, more work needed to be done. Published the two working papers.

The first of the working paper identified that a different, less-demanding critical aircraft was now the --
what was defined as the critical aircraft at Gnoss Field
Airport, Rob is going to go into these definitions and add
some more detail in a moment or two. But the ultimate
collection out of that was for that aircraft, what was
needed to meet the purpose and need of the project was a
300-foot runway extension rather than an 1,100-foot runway
extension that had been identified in the prior EIS. The
current runway at Gnoss Field is 3,300 feet long.

Again, this just restates again the results that
we had from the second working paper. From that, we had
enough information to then go forward and develop a
supplement to the Final EIS. That’s the document that’s out
for review right now. It’s available on the website for the
project. We’ll have the website address up at the end of
these initial presentations.

And the next actions that the FAA will be doing,
again, receiving comments on that supplement to the final,
that Draft Supplemental Environmental Impact Statement,
we’ll be evaluating those, then going to a final document
and issuing a decision.

Now I’d like to have Rob Adams of Landrum & Brown
come up and provide an overview of the Environmental Impact
Analysis, and also some background on some of the items that
I’ve just mentioned.

Again, if you want to speak tonight, please fill
out a comment card, get it to Gabriella.

If you’d like to put in a written comment tonight but not speak, you can also submit a comment form tonight, and we will also be accepting written comments through close of business on September 6th.

So, Rob, if you could go ahead?

MR. ADAMS: All right. Thanks Doug.

Good evening everybody. My name is Rob Adams. I’m with Landrum & Brown. As Doug mentioned, we prepared the Environmental Impact Statement for the Federal Aviation Administration. So I’m going to go through a few slides here that give you an overview of the environmental impact work that was completed.

The first is just an introduction to the existing airport. Gnoss Field has one runway and it is 3,300 feet. There were approximately 82,700 takeoffs and landings at the airport last year. And that number has been relatively consistent over time. The airport doesn’t airport doesn’t see a lot of wild swings in terms of, you know, changes in activity level.

The aircraft types that operate there are a combination of single and twin engine propeller aircraft, as well as small business jets.

Around the outer edge of the runway and taxiway, there is a system of levies that protect the runway from
flooding.

And the final point on here is that the airport has operational noise abatement procedures that request and suggest for the pilots to take certain actions as they’re operating in and out of the airport to help minimize impacts to the local community. So I’m going to talk a little bit more about those.

This map shows the noise abatement procedures that Gnoss Field publishes and gives to all of the pilot community. And a couple of keys on this, I’m not going to go into, you know, every single point on this, but a couple of keys here is that the main focus of this is to avoid overflying the residential areas to the south that are in the hills there. And so there’s several different types of procedures that are requested from the pilots in terms of not overflying those particular communities.

We recognize that there are times when aircraft do overfly those communities. So this is not a restriction, it’s not that it can’t happen, but it’s strongly encouraged that the pilots avoid, whenever they can, flying over those communities.

So in terms of the types of aircraft that operate at the airport, as I mentioned, it’s a combination of single and twin engine propeller aircraft, as well as small business jets. The FAA categorizes aircraft, and also
airports that are serving those aircraft, by using what’s called an Airport Reference Code. So there is something called A-I which is some -- an example aircraft is a Cessna 172. These are the smallest propeller-driven aircraft. And Gnoss Field, actually, most of the activity that occurs at the airport is operated by A-I types of aircraft.

The next category is a B-I. And the example aircraft for that is the Cessna 525. That aircraft was actually the critical aircraft in the June 2014 Final EIS and that was what was driving the 1,100-foot runway extension. But as you know, and as Doug Mentioned, since then more evaluation has been done and the B-II is now actually the critical aircraft and it’s -- and I want to get this wording correctly here -- it’s actually the family group of turboprop aircraft, including the Beechcraft Super King Air 200, and that’s representing the family of critical aircraft. And again, the King Air is the example aircraft in that family of aircraft types.

So one of the main elements that we prepare as part of an Environmental Impact Statement is what we call purpose and need. And this is where we define the need as the problem and the purpose as the solution to that problem.

So for the EIS, it’s the existing runway length. The 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.

And the purpose of the proposed action 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.

So what that means in simple terms is that during these hot weather conditions, existing aircraft cannot operate with a full payload with the existing runway length. And, again, we're looking at the critical aircraft which is that family grouping of turboprop aircraft.

So the critical aircraft is what we -- is defined as the most demanding aircraft in terms of the physical dimensions of the airport. And that takes -- that looks at the runway length and the runway width. It also looks at taxiways and the separation between the taxiway and the runway. And it has to have a regular use. Regular use is defined as 500 or more itinerant operations, takeoffs and landings, to be defined as the critical aircraft. The runway length determination that was prepared was based on the requirements of the critical aircraft. So you see how these two things work together. Critical aircraft has to have at least 500 operations, takeoffs and landings, at the airport. That's how it gets defined. And then we use that
critical aircraft when we calculate the runway length
requirement.

So, also, when we're looking at that, we use, for
calculation purposes, we use the hot weather, which it's
defined as the main daily maximum temperature of the hottest
month. So when we did our calculations and we looked at the
NOAA data for Gnoss Field area, we found that July, August
and September were the hottest months. And the mean daily
maximum during those months was 82 degrees Fahrenheit.

The existing runway length results in operational
weight restrictions for some aircraft during these hot
weather conditions. And what that means is that pilots are
not able to go out and depart using full, either fuel or
payload, so they have to make a decision of do I take more
fuel or do I take more payload? But they can't do both.
They can't have a full payload and full fuel, so that's the
restriction that's in place and that's what we're trying to
address, is through that, through the project.

So let's talk about the preferred alternative.
The project includes shifting the runway 106 feet to the
north and extending the runway by 300 feet to the north.
Shifting that runway keeps the entire project within the
current airport boundary. There's also a taxiway that's
parallel to the runway. And that taxiway would be extended
to the full length of the runway.
There's also another element of the project, is to construct what we call runway safety areas for the B-II type of aircraft. These runway safety areas provide protection for the aircraft in case it goes off of the runway. It provides a flat surface, not only for the aircraft but also for emergency vehicles that might be supporting that aircraft. So the size of the critical aircraft is such at the airport currently needs to expand those safety areas, so that's part of the project.

The levy that I mentioned at the beginning would have to also be extended and realigned.

And then there's certain navigational aids that are on the field that allow aircraft -- that give guidance to aircraft when they are landing at the airport. Those would have to be repositioned so that they're in relationship to the ends of the runways.

So this diagram shows you what I just went through but I'll sort of let you look at that for a moment. But, essentially, the runway is shifting to the north. North is to the left on our screen here. And then there's an extension. The brown area just on the north side of the runway, that's the runway safety area that I mentioned. And then the green and blue lines that you see around there, that's the levy extension and the drainage extension that I mentioned.
To the south, you can see that it’s shifted to the north a little bit. And then there’s some changes to the taxiways down there that will now comply with the most recent standards from the FAA in terms of taxiway and runway connection.

So we looked at several different alternatives as we went through this evaluation. We are required to look at no-action, which means not building anything, so we looked at that. That was Alternative A. Alternative B was the sponsor’s -- the County’s original proposed project which was the 1,100 foot runway extension. We looked at Alternative D which was an extension that split that 1,100 feet, 240 feet to the south and 860 feet to the north. And then the final alternative, Alternative E, is the current alternative, the FAA’s preferred alternative, which is shifting the runway by 106 feet to the northwest and extending the runway to the northwest by 300 feet.

So here’s a map that shows the different alternatives. Again, Alternative B was looking at an 1,100-foot extension to the north. Alternative D, it’s split. The blue is the runway extension on that so you can see how it’s split north and south. And then Alternative E is the preferred -- excuse me -- the preferred alternative.

There was also another, Alternative C. If you were watching closely, you saw that we skipped over the
letter C. We looked at that originally but it was rejected pretty quickly, and that was to have the 1,100-foot extension to the south, completely to the south. That was not carried forward. There was greater wetland impacts than the other alternatives. There were also some aircraft operational issues that came with that. It moved aircraft closer to the residential areas. And just in general, it had a higher cost, primarily because of acquisition requirements and mitigation requirements. So that one was rejected before we even really got into any evaluation with it.

Okay, so I’m going to talk a little bit about the environmental impacts that we disclosed as part of the supplemental to the Final EIS.

So the first category I want to talk about is noise. And I want everybody to understand that we use the community noise equivalent level, or CNEL, and it’s 65 decibels of CNEL. And that line, that area is where the FAA says if you are experiencing that level of noise, that you would be considered significantly impacted. If you’re not experiencing that level of noise it means you’re not significantly impacted. It doesn’t mean that you don’t hear aircraft or see them or experience their -- you know, the noise from them, but you’re not meeting that -- you’re not receiving the same level as if you were within the 65.
No homes are currently within the 65 CNEL around the airport. When we looked at Alternative B, D and E there were no homes in there and there were no significant impacts. And there’s no existing homes or any planned residential areas. We looked at that, as well, for all of the alternatives.

We also looked at wetlands. Outside of the no-action, which, of course, because there was no development there was no wetland impact. All of the alternatives included some wetland impacts, some more than others.

So each of the alternatives, we also evaluated wetland mitigation. We looked at feasible wetland mitigation sites as part of the Draft Supplement to the EIS. And there’s been quite a bit of consultation between the County and the federal agencies so far, and that consultation will continue to continue to see if there’s other opportunities for mitigation sites.

We also looked at threatened and endangered species, and those included the salt marsh harvest mouse, as well as the California clapper rail -- excuse me -- which is the Ridgeway’s Rail now. We noted that there were habitat impacts to these species. Again, the no-action had no impacts to the species or their habitat. But all of the other alternatives included impacts to the habitat and to various degrees.
Because of those impacts, there were mitigation options that were identified. And consultation was done and will be continuing. As the project would go forward, there will be more consultation on that to clarify that. But we did identify impacts and also identified a mitigation opportunity.

So we looked at many other categories of impacts and those are all listed on the screen here for you. None of these categories included significant impacts as we went through the evaluation.

So at this point, that concludes the presentation part. I think we’re going to set up the room here so that you have an opportunity to provide your comments.

Again, I’ll reiterate that if you’d like to speak, if you want to hold up your card, if you haven’t already given it to Gabby, now would be a good time to do that so we can call you up.

Doug, how do you -- how would you like to --

(Off mike colloquy.)

HEARING OFFICER POMEROY: Yeah. Yeah. I’ll address that.

Again, as I mentioned, this is primarily a meeting to listen to your comments. So we can try to answer short factual questions, if you have them, during -- as part of your comments. And if it’s something longer and more
complicated, we're going to ask you to submit it in writing
to be sure that we understand it so that we can respond to
it in the Final EIS.

If you can give us about maybe five minutes or so
to set up the room, we'll figure to start at like 20 to
8:00. And what I'll do for the comment forms, I'll call the
first name for the first person to come up and I'll let the
next person know that, hey, you're the next person so you
can be ready to come up.

So if you can give us a couple minutes to set up
the room?

But I do want to reiterate, this is designed to be
a NEPA public hearing, and that's primarily for us to listen
to you tonight, rather than to engage in a debate regarding
the project.

So we'll set up the room and we'll be ready in a
couple of minutes.

(Off the record at 7:30 p.m.)

(On the record at 7:37 p.m.)

HEARING OFFICER POMEROY: Okay. We'd like to go
ahead and start the public comment portion of the hearing
now. If folks could finish up your conversations? Great.

Thank you very much.

The first commenter we'll have tonight is Barbara
Salzman, representing Marin Audubon Society.
The next person after that will be Rosalie Webb, representing Black Point Environmental Action Committee.

And I ask if you can hold your comments to five minutes please? We can take comments longer than that in writing. And I will have a timer, hopefully not an annoying one.

MS. SALZMAN: Okay. Thank you. I came in last, thinking I’d be toward the end. But anyway, my name is Barbara Salzman. I’m representing the Marin Audubon Society.

And I would like to speak in favor of the preferred alternative. It seems like it is the least environmentally-impacting alternative and that’s very important to us. It has fewer impacts on wetlands, as well as endangered species. And it meets the needs of the users of the airport. And so we would strongly urge you to choose that alternative.

I also have a question about the mitigation. You passed over that, the mitigation that you might need for -- or that you would need for wetland impacts. It would be good to know what you’re thinking of in terms of the mitigation.

And secondly, I also wanted to mention that -- several other benefits of the preferred alternative. One is that it won’t come as close to the smart tracks. That seems
like it's a good safety precaution. And also, it's not as
close as the earlier -- the longer alternative to the Mira
Monte area, which was mitigation for lots of impacts from
SMART (phonetic). And, also, that would have some safety
benefits for the users because it is attracting wetlands
which was -- attracting wildlife, which is the purpose of
the very successful wetland mitigation. So we would urge
you to choose the preferred alternative.

And if you could give us some idea of what you're
thinking of for mitigation, it would be great.

MS. WEBB: I'm Rosalie Webb and I represent the
Black Point Environmental Action Committee.

Before 8:00 this morning, two different jets took
off, honest. And it's been a constant problem.

Now there's -- you have an operational noise
abatement but I wish you could make it tougher because this
year, I think the airplanes have been worse. I'm not sure
why, but they are. Our area is just beyond Bahia, just
south of there. You probably are aware of it. But the
noise is terrible. And it seems totally unnecessary for
these hobby pilots.

Thank you.

HEARING OFFICER POMEROY: Since Rosalie Webb beat
me to it, I didn't get a chance to announce what the next
speakers are. But I'm going to provide a little bit of
brief factual response to the questions from Barbara
Salzman.

    After I do that the next speakers will be
Christopher Gilkerson.

    And then Gabriella Fiazies, and I apologize if I
botched your last name.

    With regard to mitigation for this project, we
have invited the Army Corps of Engineers to be a cooperating
agency on this EIS. After the EIS is completed there will
have to be a Clean Water Act section 404 permitting process
that’s gone through. The EIS identifies mitigation ratios
which are consistent with what the County has done in the
past.

    Also in this section in the EIS, you can read that
the County and the FAA recognize that we’re going to need to
go out and reverify some site conditions during part of the
process of this EIS. If you live in California, you know
there’s been quite a drought, so we know there will need to
be some reverification of conditions and working with Marin
County, Army Corps of Engineers and the public regarding
this specific site location and details and mitigation.

    UNIDENTIFIED FEMALE: (Off mike.)

    (Indiscernible.)

    HEARING OFFICER POMEROY: The question was: Is it
public?

California Reporting, LLC
(510) 313-0610
The Army Corps of Engineers' Clean Water Act section 404 process is a process that has public notification and commenting.

With that, I'd like to ask Mr. Christopher Gilkerson to come up and comment.

MR. GILKERSON: So I'm Christopher Gilkerson. I live in the Rush Creek neighborhood just south of the airport. And a number of my neighbors are here for this important hearing.

I also want to thank Supervisor Arnold and her assistant for joining us as well.

So we do support the preferred Alternative E. We have commented along the way over these many years about the original, and I think it's still officially the County-sponsored project, which is Alternative B. So I'd like to go through a few of those reasons why we oppose Alternative B, and then a few reasons in support of Alternative E.

So we've long opposed adding 1,100 feet to the current runway because, number one, it's inconsistent with the required runway length analysis. And I think we had a very careful walkthrough of the proper way to do that analysis. It would have a much larger impact on the wetlands, as Barbara Salzman pointed out.

And, you know, we're all taxpayers. It would just be too costly for the County, even with FAA grants,
especially given sea level rise and the ongoing maintenance
of those levies. I mean, it’s just a much bigger thing for
the County to take on. And I know that’s part of the
political decision. But, ultimately, the Board of
Supervisors is going to have to make that political
decision.

And then, primarily, it’s because it would enable
larger jets to use our small Gnoss Field. And we do
appreciate the vast majority of the pilots who I think do,
in all good faith, try to abide by those airport noise
abatement procedures. But as Rosalie pointed out, it
doesn’t always happen, especially with the jets. And it may
not violate the decibel level, which is the official way you
do the analysis for the Environmental Impact Statement, but
it interferes with the use and enjoyment of our property and
our families. And we are Marin taxpayers and that’s
important, certainly, for the political considerations.

I will say that even with the smaller project, 300
feet runway extension, I read the thorough report to the
Board of Supervisors on July 16th, 2019 and it looks like it
would cost the Marin County taxpayers about $2 million, even
with the FAA grants, so I think that’s something everybody
has to understand.

Now, putting aside the cost, the reason why, given
the alternatives, we do support Alternative E is because it
2.1 (cont'd)

2.4

does match the purpose and the need. And again, we had a
tvery careful review of that tonight. It’s the correct
identification of the critical aircraft. It would reduce
impacts to the wetlands, be less costly, and would not
result, at least, in more noise over our neighborhoods to
the south of the airport.

We will put this in a comment letter. I know
you’re taking notes. I appreciate that. We’ll put this in
another letter. But we do disagree with some of the
commenters.

The purpose of this project is not about general
safety. That is not the purpose of the project. I’m happy
to see that the runway safety areas are part of the project.
That makes perfect sense.

I do have a question why it’s 300 feet for
Alternative E when it was 240 feet for the other
alternatives? I think that’s a question we would like
answered.

There’s also no evidence that Marin County
emergency preparedness depends on extension of the runway to
1,100 feet. I mean, there as a Marin County Grand Jury
report in 2014 that totally debunked that myth, so that
can’t be a reason.

And then, again, we agree with Landrum & Brown’s
responses to various comments that they did not do the

California Reporting, LLC
(510) 313-0610
runway length analysis correctly. You looked at fuel logs, you looked at radar data, interviews, and the critical aircraft is the B-II turbo props. So thank you for doing that proper analysis.

HEARING OFFICER POMEROY: Yeah. I’m going to address one comment real -- or one question real quick, and then ask Gabriella Fiazies to come up.

With regard to the 200-foot -- 240-foot versus 300-foot comment, I would ask you to put that one in writing because I know it’s more than just me who’s going to give you the details on the answer to that.

MR. GILKERSO: Okay.

HEARING OFFICER POMEROY: Gabriella?

MS. FIAZIES: Hi. No particular comments. I just had a couple of questions. And I apologize, I haven’t done any research. I’m new to the neighborhood.

So my first thought was increase in air traffic. And so, currently, can you let us know where are the current landings and takeoffs, let’s say on average, monthly, maybe yearly? Can you quantify that in more shorter terms?

And two, will the 300-foot extension, will that allow for bigger aircrafts to land? So there’s critical and non-critical that you mentioned. What are the non-critical? How often do they come in and out of the airport? And will those increase and allow for an increased or bigger cargo
planes to come in and out? I think, as a resident, that’s kind of the primary concern. And so how will this increase the noise level consequently?

That’s it.

HEARING OFFICER POMEROY: (Off mike.) Are there any other commenters? Do we have any other comment cards?

Again, (indiscernible) before I can answer.

With regard to the questions from the last speaker, I would ask you to review the EIS with regard to those questions. If you do not believe that they are answered satisfactorily then, please, provide us comments to identify the concerns that you have so that we can address them in the final.

And then the next speaker that we have is Susan Stompe.

Did I say that right?

MS. STOMPE: Stompe.

HEARING OFFICER POMEROY: Stompe, with Marin Conservation League.

MS. STOMPE: Yes, Susan Stompe with the Marin Conservation League. And we were pleased to see that you came through with a 300-foot alternative to the 1,100-foot, which was the only one that was being addressed in the initial EIS. That provided the information that we needed to feel that you were addressing the purpose and need for
the existing fleet and not changing the fleet, so we were encouraged by that and we do support the preferred alternative, Alternative E.

And the mitigation adjustments that you’ve made, we were pleased to see. And as Barbara said, we’d like to continue to participate in keeping up with what goes on relative to the mitigation decisions. But we were happy to see that you were looking more toward the County’s ratio of mitigation for the loss of wetlands. It was particularly important to us.

So the efforts that you made to come up with this alternative and the research that you did, we appreciate that you made that decision and have come this far. And I hope that the County will take a serious note of this, too, as they balance what was approved in the EIR with the new EIS.

Thank you.

HEARING OFFICER POMEROY: Okay. Do we have any other speaker cards?

MR. KIVETT: (Off mike.) Hi everyone. This is --

HEARING OFFICER POMEROY: Okay. Yeah. Let me do one thing.

If there are other people who would like to speak, if you -- would you like to speak, sir? Yeah. Yeah. If
you could just fill out a speaker card for us?

MR. KIVETT: (Indiscernible.)

HEARING OFFICER POMEROY: Okay. We’ll get you another one. Just stand.

(Pause)

HEARING OFFICER POMEROY: Okay. Next speaker, if you could please come up to the podium? It makes it easier for our Court Reporter. Mr. Larry Kivett.

MR. KIVETT: My name is Larry Kivett. I live in Bel Marin Keys.

The question I had is: What is the percent of the current landings and takeoffs that are the special aircraft or the larger-prop or jet airplanes?

And it seems to me, if we allow the 300 feet addition, it’s just natural that there’s going to be more of these larger aircraft coming in, which leads me to believe that this a precursor to a regional commercial airport.

(Applause)

HEARING OFFICER POMEROY: Okay. Are there any other -- anyone else who would like to fill out a speaker card and speak? Okay.

With that, I’m just going to mention one last thing, then I’m going to close the FAA part of the public hearing.

I have had a request from the County that they
want to address a few other things. But since those are
outside of the EIS document, we’re actually going to close
the hearing part and then provide the podium to the County
to do that.

One last -- well, two last things. One I wanted
to mention with regard to eventually moving towards a
commercial service airport, I’ll just mention one brief
thing about the FAA’s Regulations, that there is a specific
part of the FAA’s Regulation, Part 139, where you have to
become a certificated airport to have scheduled commercial
service. That’s a fairly detailed process. And the airport
sponsor has to make an affirmative decision to do it.

Just to understand that that is something that
does not happen overnight. There have to be a number of
decisions to do such a thing by the airport sponsor.

With that, I want to thank all of you for your
participation, your comments. Thank you very much for
coming and taking the time.

With that, I’m going to go ahead and close the
public hearing at this point.

(The public hearing concluded at 7:58 p.m.)
REPORTER’S CERTIFICATE

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of September, 2019.

Eduwiges Lastra
CER-915
CERTIFICATE OF TRANSCRIBER

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

I certify that the foregoing is a correct transcript, to the best of my ability, from the electronic sound recording of the proceedings in the above-entitled matter.

__________________________
MARTHA L. NELSON, CERT**367

September 6, 2019

California Reporting, LLC
(510) 313-0610
THIS PAGE INTENTIONALLY LEFT BLANK