

# **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*.

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# **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:

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

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  
Gross Field Airport**

<b>NAME</b>	<b>ORGANIZATION (IF ANY)</b>	<b>DATE</b>	<b>COMMENT NUMBER</b>
Sarah Stokley	Advisory Council on Historic Preservation (ACHP)	7/31/2019	5.1
Holly Dowling	N/A	9/3/2019	1.1, 1.2, 4.1, 3.1, 7.5
Sheila Eakle	N/A	8/19/2019	1.1, 1.3, 7.5, 4.1
George Blackburn	Federal Emergency Management Agency (FEMA)	7/15/2019	8.1, 8.2, 8.3, 8.4, 8.5, 8.6
Linda J. Novy and Susan Stompe	Marin Conservation League	8/26/2019	2.1, 7.1, 7.2
Rocky Vogler	North Marin Water District	7/29/2019	6.1
Ron and Dee	N/A	7/18/2019	2.1
James C. Mazza	U.S. Army Corps of Engineers (USACOE)	9/5/2019	7.6
Cornell Dunning	United States Environmental Protection Agency (USEPA)	9/5/2019	2.4, 7.7, 8.7, 10.1, 10.2, 11.1, 3.2
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	N/A	9/6/2019	2.1, 4.2
Barbara Salzman	Marin Audubon Society	8/22/2019	2.4, 7.3, 2.1
Rosalie Webb	Black Point Environmental Action Committee	8/22/2019	9.1
Christopher Gilkerson	Rush Creek Neighborhood	8/22/2019	2.1, 2.4, 2.3, 9.1, 2.1, 2.4, 4.2
Gabriella Fiazies	N/A	8/22/2019	1.3
Susan Stompe	Marin Conservation League	8/22/2019	2.1, 7.4
Larry Kivett	N/A	8/22/2019	1.3

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# Advisory Council on Historic Preservation

## **Pomeroy, Douglas (FAA)**

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**From:** Sarah Stokely <sstokely@achp.gov>  
**Sent:** Wednesday, July 31, 2019 5:38 AM  
**To:** Pomeroy, Douglas (FAA)  
**Cc:** Tozer, Tristan@Parks  
**Subject:** Notice of Availability - Draft SEIS Gness Field Airport - Proposed Extension of Runway 13/31 Novato, Marin County, California  
**Attachments:** FAA Letter July 8, 2019 Notice of Availability of Draft SEIS Gness Field Airport.pdf

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)

5.1 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](mailto:sstokely@achp.gov)

[Register now](#) for the ACHP's all-new Section 106 classroom training courses in 2019!

**Pomeroy, Douglas (FAA)**

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**From:** Holly Dowling <hollyd1225@gmail.com>  
**Sent:** Tuesday, September 03, 2019 3:02 PM  
**To:** Pomeroy, Douglas (FAA)  
**Subject:** Comment on the Draft Supplemental Environmental Impact Statement for Gness Field

Dear Mr. Pomeroy,

1.1 I am writing to endorse Option A; no change for the runway extension at Gness 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.

1.2 The critical class of plane that this project aims to help comprises less than 1% of the planes that use Gness 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.

4.1 Over the years, Gness 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.

3.1 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.

7.5 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



Eakle

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,

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

1.3 [ I lived here while Hamilton was an active airfield and while the plan for Gness 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.

7.5

4.1 [ 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*

Sheila Eakle  
2 Santa Victoria Ct.  
Novato, Ca. 94945



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Federal Emergency Management Agency (FEMA)  
 U.S. Department of Homeland Security (FEMA)  
 FEMA Region IX  
 1111 Broadway, Suite 1200  
 Oakland, CA. 94607-4052



FEMA

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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 – Gness 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.

8.1

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:

8.2

- 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.

8.3

- 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.

8.4

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

8.5

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

**Please Note:**

8.6

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 of my staff who can provide your agency with floodplain management technical expertise and guidance.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregor Blackburn", written over a horizontal line.

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

# Marin Conservation League



Protecting Marin Since 1934

August 26, 2019



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

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

Dear Mr. Pomeroy:

2.1 The Marin Conservation League (MCL) has reviewed the recently released Supplement to the EIS on Gness 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.

7.1 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.

7.2

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*  
 Linda J. Novy  
 President, Marin Conservation League

*Susan Stompe*  
 Susan Stompe  
 Chair, MCL's Land Use & Transportation Committee

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PHONE: 415.485.6257  
 FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org  
 WEB: marinconservationleague.org

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



July 29, 2019

999 Rush Creek Place  
P.O. Box 146  
Novato, CA 94948-0146

PHONE  
415-897-4133

EMAIL  
[info@nmwd.com](mailto:info@nmwd.com)

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[www.nmwd.com](http://www.nmwd.com)

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, Gness Field Airport – Propose Extension of Runway 13/31, Novato, Marin County, California

Dear Mr. Pomeroy:

6.1

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 Gness 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](mailto:rvogler@nmwd.com).

Sincerely,

Rocky Vogler  
Chief Engineer

RV edm  
R\CHIEF ENGINVOGLER\Misc Files\Gness Airport Runway Extension July 29 ltr to FAA.docx

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**Pomeroy, Douglas (FAA)**

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**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





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

United States  
Environmental  
Protection  
Agency (USEPA)

September 5, 2019

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), Gness 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 Gness 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 (LEDPA). We appreciate FAA aligning the agency's preferred alternative with the CWA Section 404 permit LEDPA, 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](mailto: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

2.4 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 (LEDPA). 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.

7.7 **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 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 Gness 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 Gness 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<sup>1</sup> identifies Gness 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 Gness 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<sup>2</sup>, 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,

<sup>1</sup> <https://www.marincounty.org/main/marin-sea-level-rise/baywave/vulnerability-assessment>

<sup>2</sup> <https://www.fema.gov/national-mitigation-investment-strategy>

especially for buildings and infrastructure, and emphasizes local leadership and building resilient communities.

8.7

**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<sup>3</sup> 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.

10.1

**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

10.2

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.

11.1

**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

<sup>3</sup> 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.

11.1  
(cont'd)

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*".

3.2

**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.



DEPARTMENT OF THE ARMY  
SAN FRANCISCO DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
450 GOLDEN GATE AVENUE  
SAN FRANCISCO, CALIFORNIA 94102

U.S. Army  
Corps of  
Engineers  
(USACOE)

SEPTEMBER 5, 2019

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 Gness Field Airport, Marin County, California.

7.6 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;

- 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](mailto: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

Gilkerson and Matthews /  
Nebb / Morris and Hecht /  
Ross / Parnes / Markx /  
Bergman / Shaw /  
Gahan / Tuscher / Yee /  
Ring and Bonner /  
Donadio / Hoegger / Harris-

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 Gness Field Airport Proposed Extension of Runway 13/31 Johnson**

Dear Mr. Pomeroy:

We appreciate this additional opportunity to provide our comments and views about the proposed project to extend the runway at Gness 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 again 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.

2.1  
4.2

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 (known 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 Gross 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

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
Jeff and Leslie Belingheri	Dave and Kris Donadio
Sandy and Ed Hoeffler	Jean Harris-Johnson

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 Gness 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 Gness 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

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

<b>Chris and Lisa Free</b>	<b>Michael F. Ring and Jacqueline A. Bonner</b>
<b>Catherine and John Yee</b>	<b>Dave and Kris Donadio</b>
<b>Russell and Lisa Helfond</b>	<b>Katherine Walker</b>
<b>Melanie and Rob Walker</b>	<b>Frank Cioffi and Leza Danly</b>
<b>John Conway</b>	<b>Bob and Patty Hewett</b>
<b>John and Bambi Mengarelli</b>	<b>Sandy and Ed Hoeffler</b>
<b>Wanda Sarti</b>	<b>Matthew and Trisha Mauer</b>
<b>Matt and Jan Lennon</b>	

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 )  
 Gness Field Airport )  
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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

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

1  
2 P R O C E E D I N G S

3 7:03 P.M.

4 NOVATO, CALIFORNIA, THURSDAY, AUGUST 29, 2019

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

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

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

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

24 First, we have Amy Schroeder here and she is on  
25 the staff for Congressman Jared Huffman. We have Board of

1 Supervisors Representative Dennis Rodoni is here tonight.

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

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

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

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

23 Are we using the little one or the big one?

24 We're using the little one. Fill it out and  
25 indicate to her and she will be coming around. You can just

1 hold up your hand after you fill it out, indicating that you  
2 wish to speak tonight, and we'll collect them all up.

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

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

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

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

19           As a reminder, we are here tonight to listen to  
20 what you have to say and not to debate the details or the  
21 merits or particular parts of the EIS. If there's a short  
22 factual question during your comments that you have, we'll  
23 try and answer it, but for everything else, we're going to  
24 listen, take it back and evaluate it and provide a response  
25 in the Final Environmental Impact Statement.



1           Again, for those of you who came in late, if you  
2 would like to speak tonight, please fill out a speaker card  
3 and give it to Gabriella back there who will get it to us.

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

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

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

22           After the Draft Environmental Impact Statement and  
23 Environmental Impact Report were issued, the federal  
24 government and Marin County separated out how the documents  
25 proceeded from that point. Marin County issued and

1 certified a Final EIR in February of 2014. The FAA issued a  
2 Final EIS in June of 2014. And we received comments and  
3 evaluations on that document that led us to, instead of  
4 issuing a decision on that document, do more analysis. And  
5 we initially identified that requirement with the County in  
6 early 2015.

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

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

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

24           The first of the working paper identified that a  
25 different, less-demanding critical aircraft was now the --

1 what was defined as the critical aircraft at Gness Field  
2 Airport, Rob is going to go into these definitions and add  
3 some more detail in a moment or two. But the ultimate  
4 conclusion out of that was for that aircraft, what was  
5 needed to meet the purpose and need of the project was a  
6 300-foot runway extension rather than an 1,100-foot runway  
7 extension that had been identified in the prior EIS. The  
8 current runway at Gness Field is 3,300 feet long.

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

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

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

25           Again, if you want to speak tonight, please fill

1 out a comment card, get it to Gabriella.

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

6 So, Rob, if you could go ahead?

7 MR. ADAMS: All right. Thanks Doug.

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

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

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

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

1 flooding.

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

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

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

22           So in terms of the types of aircraft that operate  
23 at the airport, as I mentioned, it's a combination of single  
24 and twin engine propeller aircraft, as well as small  
25 business jets. The FAA categorizes aircraft, and also

1 airports that are serving those aircraft, by using what's  
2 called an Airport Reference Code. So there is something  
3 called A-I which is some -- an example aircraft is a Cessna  
4 172. These are the smallest propeller-driven aircraft. And  
5 Gness Field, actually, most of the activity that occurs at  
6 the airport is operated by A-I types of aircraft.

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

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

23           So for the EIS, it's the existing runway length.  
24 The 3,300 feet cannot fully accommodate the existing  
25 aviation activity as represented by the family grouping of

1 critical aircraft that regularly uses the airport under hot  
2 weather conditions.

3           And the purpose of the proposed action is to allow  
4 existing aircraft, as represented by the family grouping of  
5 critical aircraft at Gness Field Airport, to operate without  
6 operational weight restrictions under hot weather  
7 conditions.

8           So what that means in simple terms is that during  
9 these hot weather conditions, existing aircraft cannot  
10 operate with a full payload with the existing runway length.

11       And, again, we're looking at the critical aircraft which is  
12 that family grouping of turboprop aircraft.

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

1 critical aircraft when we calculate the runway length  
2 requirement.

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

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

19           So let's talk about the preferred alternative.  
20 The project includes shifting the runway 106 feet to the  
21 north and extending the runway by 300 feet to the north.  
22 Shifting that runway keeps the entire project within the  
23 current airport boundary. There's also a taxiway that's  
24 parallel to the runway. And that taxiway would be extended  
25 to the full length of the runway.



1           There's also another element of the project, is to  
2 construct what we call runway safety areas for the B-II type  
3 of aircraft. These runway safety areas provide protection  
4 for the aircraft in case it goes off of the runway. It  
5 provides a flat surface, not only for the aircraft but also  
6 for emergency vehicles that might be supporting that  
7 aircraft. So the size of the critical aircraft is such at  
8 the airport currently needs to expand those safety areas, so  
9 that's part of the project.

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

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

17           So this diagram shows you what I just went through  
18 but I'll sort of let you look at that for a moment. But,  
19 essentially, the runway is shifting to the north. North is  
20 to the left on our screen here. And then there's an  
21 extension. The brown area just on the north side of the  
22 runway, that's the runway safety area that I mentioned. And  
23 then the green and blue lines that you see around there,  
24 that's the levy extension and the drainage extension that I  
25 mentioned.

1           To the south, you can see that it's shifted to the  
2 north a little bit. And then there's some changes to the  
3 taxiways down there that will now comply with the most  
4 recent standards from the FAA in terms of taxiway and runway  
5 connection.

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

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

24           There was also another, Alternative C. If you  
25 were watching closely, you saw that we skipped over the

1 letter C. We looked at that originally but it was rejected  
2 pretty quickly, and that was to have the 1,100-foot  
3 extension to the south, completely to the south. That was  
4 not carried forward. There was greater wetland impacts than  
5 the other alternatives. There were also some aircraft  
6 operational issues that came with that. It moved aircraft  
7 closer to the residential areas. And just in general, it  
8 had a higher cost, primarily because of acquisition  
9 requirements and mitigation requirements. So that one was  
10 rejected before we even really got into any evaluation with  
11 it.

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

15           So the first category I want to talk about is  
16 noise. And I want everybody to understand that we use the  
17 community noise equivalent level, or CNEL, and it's 65  
18 decibels of CNEL. And that line, that area is where the FAA  
19 says if you are experiencing that level of noise, that you  
20 would be considered significantly impacted. If you're not  
21 experiencing that level of noise it means you're not  
22 significantly impacted. It doesn't mean that you don't hear  
23 aircraft or see them or experience their -- you know, the  
24 noise from them, but you're not meeting that -- you're not  
25 receiving the same level as if you were within the 65.

1           No homes are currently within the 65 CNEL around  
2 the airport. When we looked at Alternative B, D and E there  
3 were no homes in there and there were no significant  
4 impacts. And there's no existing homes or any planned  
5 residential areas. We looked at that, as well, for all of  
6 the alternatives.

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

11           So each of the alternatives, we also evaluated  
12 wetland mitigation. We looked at feasible wetland  
13 mitigation sites as part of the Draft Supplement to the EIS.

14           And there's been quite a bit of consultation between the  
15 County and the federal agencies so far, and that  
16 consultation will continue to continue to see if there's  
17 other opportunities for mitigation sites.

18           We also looked at threatened and endangered  
19 species, and those included the salt marsh harvest mouse, as  
20 well as the California clapper rail -- excuse me -- which is  
21 the Ridgeway's Rail now. We noted that there were habitat  
22 impacts to these species. Again, the no-action had no  
23 impacts to the species or their habitat. But all of the  
24 other alternatives included impacts to the habitat and to  
25 various degrees.

1           Because of those impacts, there were mitigation  
2 options that were identified. And consultation was done and  
3 will be continuing. As the project would go forward, there  
4 will be more consultation on that to clarify that. But we  
5 did identify impacts and also identified a mitigation  
6 opportunity.

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

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

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

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

19           (Off mike colloquy.)

20           HEARING OFFICER POMEROY: Yeah. Yeah. I'll  
21 address that.

22           Again, as I mentioned, this is primarily a meeting  
23 to listen to your comments. So we can try to answer short  
24 factual questions, if you have them, during -- as part of  
25 your comments. And if it's something longer and more

1 complicated, we're going to ask you to submit it in writing  
2 to be sure that we understand it so that we can respond to  
3 it in the Final EIS.

4 If you can give us about maybe five minutes or so  
5 to set up the room, we'll figure to start at like 20 to  
6 8:00. And what I'll do for the comment forms, I'll call the  
7 first name for the first person to come up and I'll let the  
8 next person know that, hey, you're the next person so you  
9 can be ready to come up.

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

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

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

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

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

20 HEARING OFFICER POMEROY: Okay. We'd like to go  
21 ahead and start the public comment portion of the hearing  
22 now. If folks could finish up your conversations? Great.  
23 Thank you very much.

24 The first commenter we'll have tonight is Barbara  
25 Salzman, representing Marin Audubon Society.

1 The next person after that will be Rosalie Webb,  
2 representing Black Point Environmental Action Committee.

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

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

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

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

23 And secondly, I also wanted to mention that --  
24 several other benefits of the preferred alternative. One is  
25 that it won't come as close to the smart tracks. That seems

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(cont'd)

1 like it's a good safety precaution. And also, it's not as  
2 close as the earlier -- the longer alternative to the Mira  
3 Monte area, which was mitigation for lots of impacts from  
4 SMART (phonetic). And, also, that would have some safety  
5 benefits for the users because it is attracting wetlands  
6 which was -- attracting wildlife, which is the purpose of  
7 the very successful wetland mitigation. So we would urge  
8 you to choose the preferred alternative.

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

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

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

9.1

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

22 Thank you.

23 HEARING OFFICER POMEROY: Since Rosalie Webb beat  
24 me to it, I didn't get a chance to announce what the next  
25 speakers are. But I'm going to provide a little bit of



1 brief factual response to the questions from Barbara  
2 Salzman.

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

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

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

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

22 UNIDENTIFIED FEMALE: (Off mike.)

23 (Indiscernible.)

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

1           The Army Corps of Engineers' Clean Water Act  
2 section 404 process is a process that has public  
3 notification and commenting.

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

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

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

2.1 [ 12           So we do support the preferred Alternative E. We  
13 have commented along the way over these many years about the  
14 original, and I think it's still officially the County-  
15 sponsored project, which is Alternative B. So I'd like to  
16 go through a few of those reasons why we oppose Alternative  
17 B, and then a few reasons in support of Alternative E.

2.4 [ 18           So we've long opposed adding 1,100 feet to the  
19 current runway because, number one, it's inconsistent with  
20 the required runway length analysis. And I think we had a  
21 very careful walkthrough of the proper way to do that  
22 analysis. It would have a much larger impact on the  
23 wetlands, as Barbara Salzman pointed out.

24           And, you know, we're all taxpayers. It would just  
25 be too costly for the County, even with FAA grants,

1 especially given sea level rise and the ongoing maintenance  
2 of those levies. I mean, it's just a much bigger thing for  
3 the County to take on. And I know that's part of the  
4 political decision. But, ultimately, the Board of  
5 Supervisors is going to have to make that political  
6 decision.

2.3  
7 And then, primarily, it's because it would enable  
8 larger jets to use our small Gness Field. And we do  
9 appreciate the vast majority of the pilots who I think do,  
10 in all good faith, try to abide by those airport noise  
11 abatement procedures. But as Rosalie pointed out, it  
9.1  
12 doesn't always happen, especially with the jets. And it may  
13 not violate the decibel level, which is the official way you  
14 do the analysis for the Environmental Impact Statement, but  
15 it interferes with the use and enjoyment of our property and  
16 our families. And we are Marin taxpayers and that's  
17 important, certainly, for the political considerations.

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

2.1  
24 Now, putting aside the cost, the reason why, given  
25 the alternatives, we do support Alternative E is because it

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(cont'd)

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

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

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

4.2

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

19 There's also no evidence that Marin County  
 20 emergency preparedness depends on extension of the runway to  
 21 1,100 feet. I mean, there as a Marin County Grand Jury  
 22 report in 2014 that totally debunked that myth, so that  
 23 can't be a reason.

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

1 runway length analysis correctly. You looked at fuel logs,  
2 you looked at radar data, interviews, and the critical  
3 aircraft is the B-II turbo props. So thank you for doing  
4 that proper analysis.

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

8 With regard to the 200-foot -- 240-foot versus  
9 300-foot comment, I would ask you to put that one in writing  
10 because I know it's more than just me who's going to give  
11 you the details on the answer to that.

12 MR. GILKERSON: Okay.

13 HEARING OFFICER POMEROY: Gabriella?

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

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

21 And two, will the 300-foot extension, will that  
22 allow for bigger aircrafts to land? So there's critical and  
23 non-critical that you mentioned. What are the non-critical?

24 How often do they come in and out of the airport? And will  
25 those increase and allow for an increased or bigger cargo

1 planes to come in and out? I think, as a resident, that's  
2 kind of the primary concern. And so how will this increase  
3 the noise level consequently?

4 That's it.

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

7 Again, (indiscernible) before I can answer.

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

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

16 Did I say that right?

17 MS. STOMPE: Stompe.

18 HEARING OFFICER POMEROY: Stompe, with Marin  
19 Conservation League.

20 MS. STOMPE: Yes, Susan Stompe with the Marin  
21 Conservation League. And we were pleased to see that you  
22 came through with a 300-foot alternative to the 1,100-foot,  
23 which was the only one that was being addressed in the  
24 initial EIS. That provided the information that we needed  
25 to feel that you were addressing the purpose and need for

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(cont'd)

1 the existing fleet and not changing the fleet, so we were  
2 encouraged by that and we do support the preferred  
3 alternative, Alternative E.

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

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

17 Thank you.

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

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

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

24 If there are other people who would like to speak,  
25 if you -- would you like to speak, sir? Yeah. Yeah. If

1 you could just fill out a speaker card for us?

2 MR. KIVETT: (Indiscernible.)

3 HEARING OFFICER POMEROY: Okay. We'll get you  
4 another one. Just stand.

5 (Pause)

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

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

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

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

18 (Applause)

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

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

25 I have had a request from the County that they



1 want to address a few other things. But since those are  
2 outside of the EIS document, we're actually going to close  
3 the hearing part and then provide the podium to the County  
4 to do that.

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

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

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

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

21           (The public hearing concluded at 7:58 p.m.)  
22  
23  
24  
25

**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.



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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

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