Marin Conservation League

1623A Fifth Avenue ● San Rafael CA 94901
(415) 485-6257 ● Fax (415) 485-6259
e-mail: mcl@marinconservationleague.org ● web site: www.marinconservationleague.org

August 28, 2008

Barry Franklin, Environmental Protection Specialist
Federal Aviation Administration, San Francisco Airports District Office
831 Mitten Road, Room 210
Burlingame, CA 94010-1303

RE: Proposed Extension to Runway 13/31 at Marin County Airport - Gnoss Field
State Clearinghouse No. 2008072037: EIR/EIS Scoping Comments

Dear Mr. Franklin:

The Marin Conservation League has been an active participant in significant land use policy decisions in Marin for almost 75 years. We appreciated the opportunity to participate in the scoping meeting at the Marin Humane Society on August 14 and to have had the opportunity to tour Gnoss Field earlier in the day.

To reiterate and expand on the comments made by a representative of our organization at the scoping meeting, we are submitting the following issues to be addressed in the EIR/EIS document:

NEED FOR THE PROJECT

The stated need for the project is to allow the existing fleet of planes based at Gnoss to fly at design capacity when the air temperature is high (around 100 Deg. F.) The extended runway will also allow larger planes to use Gnoss during normal conditions. The EIR/EIS should contain a table showing the range of aircraft by model number that can use the extended runway in average and elevated conditions. The table should also include details of each aircraft such as gross weight, allowed landing weight, engine type and number. The listed aircraft should include those currently in production and older aircraft that are currently based at Gnoss. This aircraft mix should be used in all noise analysis contained in the EIR/EIS.

The EIR/EIS should evaluate the operational impacts on a wide range of aircraft in response to weather conditions that limits these operations. The EIR/EIS should present data that shows that regardless of runway length there will always be conditions of load and weather that will limit aircraft operations. For instance, if the runway were extended to 4,400 ft., the EIR/EIS should identify the type of aircraft that would experience operational limits due to weight and load.

The EIR/EIS should include thorough examinations of alternative airport sites that would not have the constraints that exist at Gnoss Field, e.g. the Petaluma, Napa and Sonoma Airports that serve the region.

The EIR/EIS should evaluate the financial and environmental impacts of the No-build Alternative, the alternative of adding the Runway Safety Areas (RSAs) only, and the alternatives listed in Page 16 of the slide presentation of 8/14/08, compared to the other alternatives. This would require a detailed economic and cost-benefit analysis of the impacts of this runway extension.

OPERATIONS

The EIR/EIS should carefully analyze the baseline characteristics of the operations of Gnoss Field as to the composition of the 95,000 takeoffs annually and landings there by airplane type, time of day, destination, and weather conditions. This baseline should be applied to the analysis of all alternatives.

The proposed 1,100 ft. runway extension to the north plus a 240 ft. overrun will place the Runway Safety Area in conflict with the railroad right-of-way (ROW). This railroad may, in the future, carry passenger and freight trains. The EIR/EIS should evaluate the hazard of having the RSA and ROW conflicting.

It has been suggested that the RSA would need to be paved to function properly and for emergency equipment. The EIR/EIS should evaluate the probability that the paved RSA would accidentally be used as an acting runway.

The projected takeoffs and landings should include those aircraft operating under full weight and design weather AND those aircraft operating under limited conditions.

The EIR/EIS should evaluate the impact of the cross wind conditions on future aircraft likely to use the extended runway.

Increased aircraft traffic would also increase the probability of conflict between aircraft and the KCBS radio towers that are close to the airport. The EIR/EIS should evaluate the increased potential for accidents at this location.

The present configuration of Gnoss Field is non-compliant with respect to the required separation of airfield from landfill operations. The proposed runway extension to the North would only make the non-compliant situation worse. How would this be mitigated? Are there raptors in the vicinity of the landfill operation that would fly at high enough elevations that could interfere with aircraft operations? Raptors would be attracted to the landfill because of the gulls.

Takeoff and landing projections should include an evaluation of the potential increase of small business jets and small jet air taxi service.

What would trigger a requirement for air traffic control? Would the expanded runway and increased traffic require air traffic control? Who pays for the operation of air traffic control?

The airport and access road (Binford Road) have experienced severe flooding with heavy rainfall which curtailed operations and access to the airport. What improvements are proposed to protect the airport and access road? What will be the cost of construction and maintenance, and who would bear that cost?

ENERGY

Does the expansion of Gnoss Field conflict with the goals set by AB32 and AB 1473?

Will there be conflict between Federal EPA standards vs. State of California standards as has developed over automobile fuel efficiency standards? The EIR/EIS should carefully analyze California and federal EPA standards for fuel efficiency and greenhouse gas (GHG) emission requirements.

The EIR/EIS should respond to the statement "The average private plane, such as the popular two seat Cessna 172, is 30 years old, it carries a four-cylinder piston engine designed in the 1940s that burns leaded gasoline, has no catalytic converter, and gets as little as 12 miles per gallon. It's fair to say that small aircraft are gross polluters"[1] Greenhouse Gas Emissions (GHG) reductions would be better achieved by improving the performance of the aircraft fleet than by expanding runways.

The EIR/EIS should justify why the runway extension is being proposed, in that it perpetuates the use of fossil fuels in a wasteful, polluting manner. The need to travel faster and further is not a need that justifies creating severe environmental impacts.

The EIR/EIS must include a careful analysis of the Greenhouse Gas emissions of the runway expansion and increased aircraft traffic that are expected to occur comparing all alternatives.

A study is needed to determine the fallout of incomplete combustion of aircraft fuel containing lead that occurs during takeoff and landing while the aircraft is close to residential areas. Lead buildup in the cattle that graze near the airport should be evaluated. The amount in nearby wetland habitats should also be evaluated.

The EIR/EIS must evaluate the impact of the rise in sea level. This would include increasing the height of levees and the disturbance of the fill and borrow sites for such construction. The increased energy required for pumping must be determined.

The state of California is discouraging development in flood plains. With increasing sea level, an alternative of raising the elevation of the runway and support facilities should be analyzed.

There are major drainage ditches crossing the location of the proposed RSA's. Would these ditches have to be open trenches or culverts? Would open trenches satisfy RSA

[1] Mark Moore, NASA, Popular Science, August 2008 Pg. 27

requirements? What are impacts if culverts are added to area?

The EIR/EIS should evaluate the impact of upper atmosphere pollution of high flying jets compared to lower level propeller aircraft.

CO^2 emission calculation protocol has not been fully developed for all modes of transportation. The EIR/EIS should include a detailed description of the methodology in calculating the relative CO^2 generated for all alternatives with their range of operations. If the CO^2 emission protocol is contained in a separate document, that document should be included in the appendix of the report.

NOISE and TRAFFIC

Per public testimony, there are numerous violations of aircraft passing over residential areas. The number of illegal over flights cannot be determined by counting the number of phone complaints received by the Federal Aviation Administration (FAA), because it was repeatedly stated in public testimony that residents eventually give up calling due to lack of response by the FAA. The pattern of complaints and the lack of response should be compared with other airports with similar close proximities between residential areas and flight paths.

Public testimony clearly indicates that noise impacts of current operations are a severe impact that FAA is unwilling to monitor and control. The Noise Impact Analysis must include single event noise levels $_{\text{Lmax in}}$ addition to the CNEL noise studies which are +mathematical averaging of multiple noise events. The Noise Impact Analysis also needs to evaluate the impact on humans and wildlife of the expected increase in jet aircraft operations with its higher frequency noise emissions.

The noise test results included in the December 10, 1990 “Airport Land Use Plan, Marin County Airport, Analysis of Aircraft/Airport Operations shows some flights with high SEL readings. The highest was resulting from “straight in” flights A new Noise Analysis should be conducted over an extended time so as to establish the noise levels from a combination of aircraft type and flight path.

The EIR/EIS should enumerate the actual number of flights that violate the recommended flight pattern identified in the 1990 Master Plan. Enforceable mitigation alternatives must be presented as part of the analysis.

The EIR/EIS should quantify the growth of aircraft and vehicle traffic resulting from the expanded runway.

A careful design analysis of the Atherton/Highway 101 Interchange is needed. Cumulative impacts of projected traffic counts should include future major expansion of the Fireman’s Fund complex, the proposed North Novato SMART rail station, the proposed expansion of North Redwood Blvd., storage operations at Black John Slough, and increased fixed base operations at the airport.

The study, above, must disclose whether any of the Park-N-Ride facilities at this intersection will be removed from use. If so, the resulting impacts of the reduced parking must be evaluated. Note that the parking lot is normally filled beyond capacity.

The EIR/EIS should evaluate the project's conformance to Marin County and Novato General Plans with respect to noise and traffic, in particular. The EIR/EIS should conform to a minimum standard set by the "Airport Landuse Planning Handbook. Beyond these minimum standards, consideration should be given to the topography of the lands surrounding the residential areas to the south of the runway.

BIOLOGICAL RESOURCES AND OTHER ENVIRONMENTAL IMPACTS and MITIGATION MEASURES

The EIR/EIS should identify wildlife in the area and their sensitivity to noise, as well as the cumulative impact of the increased use of the runway.

The EIR/EIS should clearly indicate what mitigation would be provided for the loss of wetlands resulting from the extension of the runway, the addition of extended taxiways and two RSAs. The EIR/EIS should establish where additional/replacement wetland mitigation in the immediate vicinity would be provided. Such wetland replacement mitigation should be at least on a 2:1 basis, with no net loss as a minimum standard. (Per the Marin Countywide Plan BIO-3.2) The wetlands mitigation should not include public acquisition of existing wetlands.

The EIR/EIS should evaluate the cumulative visual and biological impacts of the hangers and roadways that have been added at the east side of the runway (which were built without specific environmental analysis) and the runway expansion.

Storm water runoff resulting from increased paving of the runway, taxiway and RSAs should be evaluated. What contaminants are in the storm water? What impact would they have on resident wildlife? How can they be mitigated?

The EIR/EIS should evaluate the buildup of perchlorate contained in jet fuel.

The discussion of alternatives should include the cumulative impacts of the proposed extensions on current and proposed wetland restoration projects within the RSAs, such as the Binford Road project on the Novato Canal.

Thank you for the opportunity to comment. We look forward to reviewing the Draft EIR/EIS documents when they are completed.

Yours truly,

Nona Dennis
President