MARIN CONSERVATION LEAGUE

Protecting Marin Since 1934

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

February 6, 2012

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

Dear Mr. Pomeroy:

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

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

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

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

projections (relative to sea level in 2000) for the state that range from 10 to 17 inches by 2050, 17 to 32 inches by 2070, and 31 to 69 inches at the end of the century.

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

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

The noise studies were performed, but only for one hour periods in the neighborhoods impacted by the airport noise. At least one of the one hour studies showed a heavy incidence of fly overs although the noise levels did not exceed Novato General Plan acceptable levels. This does demonstrate that the flight paths developed to minimize impacts on the neighboring residential are not being respected. What mechanisms can be implemented to enforce adopted procedures?

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

**Hydrology and Water Quality**

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

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

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

**Noise and Safety**

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

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

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

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

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

Yours truly,

Susan Stompe
President