



Protecting Marin Since 1934

June 9, 2016

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

Re: FAA Purpose and Need Working Paper: Extension of Runway 13/31 for Gness Field Airport.

Dear Mr. Pomeroy:

The Marin Conservation League (MCL) was pleased to receive the FAA Purpose and Need Working Paper: Extension of Runway 13/31 for Gness Field Airport. The information distributed is critical to the decision to extend Runway 13/31.

The expansion of issues related to the critical aircraft and projections for future aviation use were sorely needed in the Final EIR and EIS. This additional information reinforces our previous request for additional alternatives other than those identified in the EIR/EIS. The alternative suggested in the Purpose and Need Working Paper is to extend the runway 300 feet, instead of the 1,100 feet addressed in the EIR/EIS. We concur with the analysis that a 300 foot extension would address the projected need for the current fleet and for the probable future fleet based at Gness Field.

A 300 foot extension will still require wetland mitigation, for the full amount of wetlands lost which includes the 106 feet 'shifted' from the south end of the runway and for the Safety Zone at 300 feet. MCL encourages mitigation consistent with Marin Countywide Plan Policy BIO-3.2 that requires on-site wetland mitigation at a 2:1 replacement ratio, or 3:1 if off-site. Please provide an explanation and justification for increasing the Safety Zone to 300 feet when the EIR/EIS showed them at 240 feet.

The Gness Field location is highly vulnerable to Sea Level Rise (SLR). It is identified as being inundated even in more conservative mapping of SLR projections. That makes us question: Is it a good investment to expand an airport that will likely need to be abandoned in 50 years?

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Thank you for additional information. We look forward to the Supplemental EIS.

Sincerely,

A handwritten signature in blue ink that reads "Kate Powers". The signature is written in a cursive, flowing style.

Kate Powers
President

cc: Supervisor Judy Arnold