SECTION 5
COMMENTS AND RESPONSES TO COMMENTS OF THE DRAFT EIR

A AGENCIES COMMENTING ON THE DRAFT EIR

B ORGANIZATIONS COMMENTING ON THE DRAFT EIR

C INDIVIDUALS COMMENTING ON THE DRAFT EIR

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- **C4 Individuals and Planning Commissioners Providing Oral Comments at the 1 September 2011 County of Sonoma Planning Commission Hearing**
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D COMMENTS RECEIVED AFTER THE CLOSE OF THE COMMENT PERIOD

SECTION A
AGENCIES COMMENTING ON THE DRAFT EIR

COMMENT LETTER A1 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION – DIVISION OF AERONAUTICS

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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS - MS#40
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PERMIT AND RESOURCE MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

Flex your power!
Be energy efficient!

August 15, 2011

Ms. Crystal Acker
Sonoma County PRMD
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Ms. Acker:

Re: Draft Environmental Impact Report for the Sonoma County Airport Master Plan Implementation Project; SCH# 2008062022

1

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The project proposes to construct various safety improvements to existing Runway Safety Areas for each of the runways at Charles M. Schultz/Sonoma County Airport (Sonoma County Airport) which is located in unincorporated Sonoma County. The project will also implement some other elements of the Sonoma County Airport Master Plan Update.

The proposed runway modifications will require an amended State airport permit. Detailed information regarding State airport permit amendments can be viewed on-line at http://www.dot.ca.gov/hq/planning/aeronaut/airportpermit.html. You should also contact the Division's Aviation Safety Officer for Sonoma County, Mike Smith, at (916) 654-4380, to request a State airport permit-application package.

2

Prior to amending the State airport permit, the Division, as a responsible agency, must be assured that the proposal is in full compliance with CEQA. The Division must be provided copies of all final environmental documentation for this proposal including a notice of determination when the project has been approved. To ensure that the community will not be adversely impacted by aircraft operations, flight paths should avoid noise-sensitive and people intensive uses. Environmental documentation should include diagrams showing the location of the proposed runway modifications with the approach/departure flight paths. The diagrams should also depict the proximity of the proposed flight paths to any existing or proposed noise sensitive or people intensive uses. Consideration given to the issue of compatible land uses in the vicinity of the airport should help to relieve future conflicts between the airport and its neighbors.

"Caltrans improves mobility across California"

COMMENT LETTER A1 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION – DIVISION OF AERONAUTICS

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Ms. Crystal Acker
August 15, 2011
Page 2

3 One of the Long-Term Project Elements identified as 9A in Table 2-4 and described further on page 2-16, indicates that an on-airport aiming point for helicopters will be identified after consultation with Air Traffic Control. Aiming points are not defined by the Federal Aviation Administration (FAA) in their airport and heliport design publications. If the intent was to establish a heliport on airport property to facilitate helicopter operations, we suggest working with the FAA using their design guidance for this long-term project element.

4 The project proposal should be referred to the Sonoma County Airport Land Use Commission (ALUC) for their review and consistency finding. If inconsistencies are identified, the ALUC should take steps to amend the airport land use compatibility plan.

5 These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 4 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, Sonoma County ALUC, Sonoma County Airport

"Caltrans improves mobility across California"

RESPONSES TO COMMENT LETTER A1 – LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION – DIVISION OF AERONAUTICS

Note: This comment letter was submitted individually by both the California Department of Transportation – Division of Aeronautics and the State Clearinghouse on behalf of the California Department of Transportation – Division of Aeronautics. For economy, it is only included once in this document.

A1-1 This comment does not specifically address the analyses contained in the Draft EIR. The comment summarizing the elements of the Proposed Project is acknowledged and will be forwarded to and considered by the decision makers at the County of Sonoma Planning Commission and the County of Sonoma Board of Supervisors. As stated on page 2-21 of the Draft EIR, the County of Sonoma is fully aware and has indicated that an amended Airport Permit from the State of California Division of Aeronautics would be required.

A1-2 The Division of Aeronautics will receive a copy of the Notice of Determination if the Proposed Project is approved by the County of Sonoma Board of Supervisors.

Section 3.10 of the Draft EIR provides an analysis of the noise impacts associated with the Proposed Project. For information regarding flights paths, see Figures 4-2a through 4-2c on pages M-38 through M-40 of Appendix M of the Draft EIR.

Section 3.9 of the Draft EIR provides an analysis of the compatible land use impacts associated with the Proposed Project and identifies revisions to local general plans and the Sonoma County Compatible Airport Land Use Plan that should be made to ensure land use compatibility in the Airport vicinity. As shown in Section 3.9 of the Draft EIR, with the implementation of changes to the Comprehensive Airport Land Use Plan (CALUP), no significant land use compatibility impacts would occur as a result of the Proposed Project.

A1-3 This comment does not specifically address the analyses contained in the Draft EIR. The comment directing the County to work with the FAA and follow FAA guidance on the design of a helicopter facility when such a facility is proposed is acknowledged and will be forwarded to and considered by the decision makers at the County of Sonoma Planning Commission and the County of Sonoma Board of Supervisors.

A1-4 The Proposed Project has been referred to the Sonoma County Airport Land Use Commission (ALUC). The ALUC has reviewed the Proposed Project and provided a comment letter on the Draft EIR, which is included in this Response to Comments volume as Comment Letter A7 starting on page 5-59..

A1-5 The California Department of Transportation (District 4) received a copy of the Draft EIR and provided comments. This comment letter and the responses to the comments are included in this Response to Comments volume as Comment Letter A4 starting on page 5-45.

COMMENT LETTER A2 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME
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State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
7329 Silverado Trail
Napa, CA 94558
(707) 944-5500
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

September 16, 2011

Ms. Crystal Acker
County of Sonoma
Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Ms. Acker:

Subject: Charles M. Schulz–Sonoma County Master Plan Implementation Project, Draft Environmental Impact Report, SCH #2008062022, City of Santa Rosa, Sonoma County

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) provided for the subject Project, and have the following comments.

Birds

Mitigation Measure 3.4.5 states that surveys for burrowing owls shall be conducted during the breeding season (February 1 to August 31), no more than 30 days prior to the anticipated start of construction. This mitigation measure further states that passive relocation measures may be implemented to encourage owls to move away from the work area prior to construction. Pre-construction surveys are necessary for assessing owl presence at the site within a short time period before construction activities; however, DFG recommends that the pre-construction surveys be conducted outside of the owl breeding season but as close as possible to construction activities to avoid the problem of waiting until the breeding season when the Project could be delayed if owls are detected. Please note, DFG has concerns regarding passive eviction as it does not always avoid take and is not sufficient to mitigate impacts to owls and their habitat. 1

Projects that impact breeding and/or non-breeding burrowing owl habitat may negatively affect owl population persistence, increase energetic costs, lower reproductive success, increase vulnerability to predation, and decrease the chance of procuring a mate. Projects impacting owls and owl habitat should mitigate all significant impacts to nesting, foraging, wintering, and dispersal habitat to a level less-than-significant. Projects impacting owls or owl habitat should provide compensation that is roughly proportional to the impacts of the Project.

Mitigation Measure 3.4.6 states a buffer zone will be established around nesting birds until the breeding season has ended (August 31) or the Project biologist has confirmed that the young have fledged and are no longer reliant upon the nest or parental care for survival. As stated, this may allow nests with young birds after August 31 to be damaged by operations. Fish and Game Code § 3503.5 states it is unlawful to take, possess, or destroy any birds in the orders of Falconiformes or Strigiformes (birds-of-prey or raptors) or take, possess, or destroy the nest or

Conserving California's Wildlife Since 1870

COMMENT LETTER A2 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME
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1 eggs of any such bird. In addition Fish and Game Code 3503 protects nest or eggs of all birds. DFG recommends this mitigation measure be revised to state that the buffer zone will remain in effect until the young have fledged and are independent of the nest.

Pappose Tarplant

3 The draft EIR has identified two areas within the Project area that support pappose tarplant. To mitigate for the impacts to this plant, the Project proposes to collect the seed in the year prior to ground-disturbing activities to establish one or more new stands of pappose tarplant within the Project area following completion of grading. DFG recommends this mitigation measure be revised to state that the collected seeds of pappose tarplant will be planted within one year of completion of grading activities. A monitoring and management plan should also be developed.

California tiger salamander, Sebastopol meadowfoam, Burke's goldfields and Sonoma sunshine

4 The draft EIR proposes to mitigate for impacts to the state and federally listed California tiger salamander, Sebastopol meadowfoam, Burke's goldfields, and Sonoma sunshine by either purchasing credits at a U.S. Fish and Wildlife Service and DFG-approved conservation and/or mitigation bank or acquire land with the appropriate habitat, place a conservation easement on the land, develop a management plan, and establish a non-wasting endowment. DFG recommends that the draft EIR be revised to state that the County will obtain both a California Endangered Species Act (CESA) and a federal Endangered Species Act (ESA) authorization and complete the mitigation for impacts to these species prior to ground-breaking activities at the Project site.

Western pond turtle

5 The draft EIR proposes to place a chain link fence at the upstream and downstream limits of Airport Creek as well as up the banks and into the adjacent uplands to prevent female western pond turtles (WPT) from nesting yet allowing hatchling turtles to leave. As proposed, this technique will prevent all other aquatic organisms from using the area as a movement corridor or trap aquatic organisms within the exclusion area. DFG recommends exclusion fence be placed along the toe of the slopes on both banks extending from the upstream impact site to the downstream impact site and extending approximately 350 feet into the uplands no earlier than April 1. One-way funnels should be placed to allow any hatchling WPT or over wintering adults to leave the Project site. As part of the dewatering plan for the creek during Project activities, a qualified biologist should capture and relocate WPT to an area outside of the Project site.

6 WPT use the uplands for over wintering and nesting. Female WPT typically lay eggs anywhere from 65 to 330 feet from the water in open areas with good sun exposure dominated by grass and herbaceous vegetation. The draft EIR should assess the potential loss of WPT upland habitat and provide mitigation for any loss of this habitat that is roughly proportional to the impacts of the Project.

Mammals

7 The draft EIR identified pallid bats occurrences within the Project study area and stated that they roost in cliff fissures, abandoned buildings, and under bridges. In addition to cliff fissures, bridges, and buildings, pallid bats can also occupy trees year round and are particularly susceptible to disturbance during the maternity season and hibernation. Pallid bats do not migrate and stay close to their summer roosts. Pallid bats are also known to switch roosts on a

COMMENT LETTER A2 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME
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7 daily basis and seasonally. The Project proposes to remove 0.8 acres of oak woodland habitat. DFG recommends a qualified biologist conduct a habitat assessment for potentially suitable bat habitat within six months of Project activities. If the habitat assessment reveals suitable bat habitat, then tree trimming and/or tree removal should only be conducted during seasonal periods of bat activity (August 31 through October 15, when young would be self-sufficiently volant and prior to hibernation, and March 1 to April 15 to avoid hibernating bats and prior to formation of maternity colonies), under supervision of a qualified biologist. Trees should be trimmed and/or removed in a two-phased removal system conducted over two consecutive days. The first day (in the afternoon), limbs and branches would be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices or deep bark fissures would be avoided, and only branches or limbs without those features would be removed. On the second day, the entire tree would be removed.

8 The draft EIR has identified the possibility of the occurrence of American badger, a California Species of Special Concern, within the Project area and will conduct pre-construction surveys. If the surveys determine the presence of badger dens, then den monitoring and eventually den blocking will be completed. DFG recommends that the Project also mitigate for the loss of habitat by preserving in perpetuity existing occupied habitat on a 1:1 ratio. That is for every acre of habitat loss, no less than an acre of habitat should be preserved.

Riparian Habitat

9 The draft EIR describes impacts to approximately 2,065 linear feet of stream and riparian habitat to Airport Creek and 0.2 acres to Upper Ordinance Creek. The Project proposes to mitigate for all of these impacts at a 1:1 ratio. The Project specifically proposes to enhance 650 linear feet of habitat to mitigate for the installation of 650 feet of culvert; re-route 850 feet of creek and establish riparian scrub habitat to mitigate for filling 850 feet of the channel; and enhance riparian habitat within the Mark West Creek/Windsor Creek watershed to mitigate for the removal of 565 linear feet of riparian habitat, which includes oak trees.

Riparian systems are comprised of water and a complex structure that contains a canopy, sub-canopy, and understory of vegetation that support neotropical migrant and resident birds, amphibians, reptiles, fish, and small and large mammals. The loss and degradation of the riparian system contributes to the decline of native species and an increase in predation.

The proposed out-of-kind mitigation and the 1:1 ratio are inadequate for the impacts to the stream and riparian habitat for the culvert installation on Airport Creek. The proposed mitigation should be in-kind, meaning that the mitigation would provide habitat and function that is similar to that affected by the proposed Project (i.e. removal of a culvert) at a 3:1 ratio. If the Project cannot accomplish in-kind mitigation then out-of-kind mitigation could be used at a minimum of a 3:1 ratio as long as the mitigation can provide greater environmental benefits.

10 The Project also proposes to construct 850 feet of new stream channel with a minimum width of 26 feet that would mitigate for filling the existing stream channel which is a 1:1 ratio. The new stream channel will be planted with low stature shrubs and/or herbaceous species. The Project permanently impacts Airport Creek not only by filling the channel but also by changing the associated habitat. The proposed 1:1 mitigation ratio is inadequate for this type of impact. At a

COMMENT LETTER A2 - LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME
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10 minimum, the mitigation ratio should be at a 3:1. Furthermore, all the mitigation measures associated with the stream should be revised to state that the Project will mitigate at a ratio approved by DFG.

11 Although the Project evaluated re-routing Airport Creek, the alternative was rejected due to an increase in wildlife hazards related to birds. There are numerous seasonal wetlands, vernal pools, and ponds located within the Airport Study Area including adjacent to the runways that is suitable habitat for waterfowl. Re-routing the entire impact area of Airport Creek instead of placing 650 feet of the stream in a culvert and permanently converting 1,415 feet of riparian habitat to scrub habitat is a superior alternative biologically. DFG recommends that the County of Sonoma re-evaluate the alternatives associated with the re-routing of the entire impact area associated with Airport Creek.

12 Mitigation Measure 3.4.14 states that herbaceous plant species will be planted along the relocated open channel banks as stated in Mitigation Measure 3.4.3a. Mitigation Measure 3.4.3a is the California tiger salamander avoidance and minimization measures that shall be implemented before and during construction work. Please revise the draft EIR to include mitigation measures that will address the impacts on the loss of the wildlife movement corridor along Airport Creek.

Oaks

13 The Project will result in the loss of 0.8 acres of oak woodland. The Project proposes to mitigate for the loss of oaks by replanting oaks at a 3:1 ratio for trees greater than 5 inches diameter at breast height (dbh) (4.5 feet above the ground). Oak woodlands provide habitat for numerous species of wildlife, moderates temperature extremes, reduces soil erosion and sustains water quality. Oaks woodlands natural regeneration has been substantially reduced; that is young trees are not establishing to replace older tress as they senesce and die. As such, replacing only trees greater than 5 inches in diameter is inadequate. DFG recommends that the removal of oak tree species be replaced based on the total dbh being removed. For example, if the combined number of trees being removed measure 100 inches dbh, then the combined dbh of the oak replacement trees should total at least 100 inches.

If you have any questions, please contact Ms. Stephanie Buss, Staff Environmental Scientist, at (707) 944-5502; or Mr. Scott Wilson, Environmental Program Manager, at (707) 944-5584.

Sincerely,

Scott Wilson FOR

Carl Wilcox
Regional Manager
Bay Delta Region

cc: State Clearinghouse

RESPONSES TO COMMENT LETTER A2 – LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME

Note: This comment letter was submitted individually by both the California Department of Fish and Game and the State Clearinghouse on behalf of the California Department of Fish and Game. For economy, it is only included once in this document.

A2-1 Burrowing owls are not known to breed on the Santa Rosa Plain; they are known to occur only as rare winter visitors. In general, the Airport and the Santa Rosa Plain lack suitable breeding sites (e.g., ground squirrel burrows) for this species. The single observed occurrence of this species at the Airport was a non-breeding adult that was observed in the winter of 2003. Therefore, the potential for occurrence of breeding burrowing owls at the Airport or anywhere on the Santa Rosa Plain is remote.

The County concurs with the comment that pre-construction surveys conducted toward the end of the non-breeding season may be the most efficient means of avoiding project delays if occupied burrowing owl burrows are detected. Therefore, page 3.4-41, Mitigation Measure 3.4.5, first bullet of the Draft EIR is revised to read (deleted text in ~~strikethrough~~ and new text in double underline):

> **Pre-construction Surveys.** The Project Biologist shall conduct pre-construction surveys within grasslands and within all potential human-made structures (e.g., culvert, debris piles) that will be affected by proposed project construction work. Surveys shall be conducted toward the end of the non-breeding season (January) ~~during the breeding season (February 1 to August 31), no more than 30 days prior to the anticipated start of construction~~. Surveys shall be conducted from one hour before to two hours after sunrise or two hours before to one hour after sunset in order to maximize the opportunity of observing owls on the site. ~~If ground-disturbing work is delayed or suspended for more than 30 days following the preconstruction survey, the Project Biologist shall re-survey the site within seven days of the start of construction.~~

The County acknowledges the commenter's concerns on the passive relocation and the avoidance of take. As stated in Mitigation Measure 3.4.5 on pages 3.4-41 and 3.4-42 of the Draft EIR, passive relocation of burrowing owls, if required, will be conducted only with the prior approval of the California Department of Fish and Game (CDFG).

With respect to the need for compensatory mitigation for potential impacts to burrowing owls, page 3.4-42, paragraph 1, new bullet is added as follows:

> **Other Mitigation.** If occupied burrowing owl burrows are observed within the project disturbance area during the pre-construction surveys, additional measures will be identified and implemented, consistent with DFG guidance[36] and subject to the approval of DFG, in order to ensure that all burrowing owl impacts are mitigated to the level of less-than-significant.

A2-2 Page 3.4-43, Mitigation Measure 3.4.6, second bullet of the Draft EIR is revised to read (deleted text in ~~strikethrough~~ and new text in double underline):

[36] California Dept. of Fish and Game. 2008. *Guidance of Burrowing Owl Conservation.* DFG Habitat Conservation Branch, Wildlife Branch, Bay-Delta Region. April 14, 2008.

Buffer Zones. If birds are observed nesting, the Proposed Project shall avoid construction activity within a buffer zone around the nest (typically 50 to 250 feet of the nest) until ~~the breeding season has ended, or~~ the Project Biologist has confirmed that the young have fledged and are no longer reliant upon the nest or parental care for survival. The size of the nest buffer shall be determined by the Project Biologist, in consultation with CDFG, based on the location of the nest, the nesting species present, and types of construction activities that may cause potential nest abandonment.

A2-3 Mitigation Measure 3.4.1 on page 3.4-37 of the Draft EIR has been revised to read (deleted text in ~~strikethrough~~ and new text in double underline):

Mitigation Measure 3.4.1

Following seed-set in the late summer/early fall (September - November), prior to the year in which construction is scheduled, seeds shall be collected from stands of pappose tarplant within the Airport Study Area. The harvested seeds shall be properly stored and shall be used to re-establish one or more new stands of tarplant within the Airport Study Area, within one year of ~~following~~ completion of grading. The Project Biologist[37] shall supervise and document compliance with the mitigation measure and shall subsequently prepare a report summarizing compliance to the County. Additional monitoring and/or management of the new tarplant stands will be conducted, if required by DFG.

For a detailed discussion of the revisions to Mitigation Measure 3.4.1, please see the response to comment #B5-4 submitted by the California Native Plant Society – Milo Baker Chapter (Comment Letter B5) starting on page 5-105.

A2-4 The requirement that the County will need to obtain authorizations under the State and Federal Endangered Species Acts is reflected in Section 3.4.1.1 (Regulatory Context) of the Draft EIR. The County does not agree with the commenter's statement that mitigation must be completed prior to ground-breaking activities. This requirement is applicable if the County were to use the mitigation bank credit purchase option for wetland and endangered species mitigation. However, federal and state regulatory policies normally allow wetland and endangered species mitigation to be completed simultaneous with the project impacts, if a "turn-key" mitigation site (rather than a mitigation bank) is used to meet wetland and endangered species mitigation needs. If the turn-key mitigation site option is selected, the County will strive to complete as much mitigation as feasible prior to ground-breaking.

A2-5 The commenter's suggested location for western pond turtle exclusion fencing along Airport Creek under Mitigation Measure 3.4.4 would not avoid impacts to western pond turtles or other aquatic organisms, nor would it be practicable. The creek reach where exclusion fencing would be placed is to be completely filled as part of the Proposed Project; thus, there would be no remaining aquatic habitat along this reach. Therefore the concerns about aquatic organisms being trapped by the fencing in this reach would

[37] A designated Project Biologist, subject to the approval of CDFG and USFWS shall be responsible for supervising and verifying compliance with all mitigation measures contained in Section 3.4.3.

not be valid.[38] Active grading and construction work would occur within the exclusion area; therefore, the concerns about maintaining wildlife movement through this area also would not be valid. Rather, wildlife movement through this area would need to be prevented during the construction period in order to avoid killing and harming wildlife.

As stated in Mitigation Measure 3.3.4 on pages 3.4-40 and 3.4-41 of the Draft EIR, the proposed fencing location and design is intended to prevent adult female turtles (and other terrestrial wildlife) from attempting to enter the active construction area (to establish new nests), while allowing over-wintering turtle juveniles that may have remained in the exclusion area to reach aquatic habitat upstream and downstream of the fencing. The fencing location proposed by the commenter would have the opposite effect, allowing wildlife to enter an active construction area above the banks of the creek. The fencing location (toe of creek bank slopes) would also not be practicable because grading work will extend to well beyond the top of creek banks requiring fence removal.

A2-6 Page 3.4-41, Mitigation Measure 3.4.4, new bullet of the Draft EIR is added as follows:

> **Other Mitigation.** If western pond turtle nests are found within the fenced exclusion area during the pre-construction surveys, additional measures will be identified and implemented subject to the approval of DFG, in order to ensure that all western pond turtle impacts are mitigated to the level of less-than-significant.

A2-7 The commenter is not correct in stating that pallid bat occurrences were identified in the Airport Study Area. As stated on page 3.4-36 of the Draft EIR, the nearest known occurrence of pallid bats is approximately 2.9 miles from the Airport Study Area. Pallid bats typically roost in rock crevices, cliff fissures, abandoned buildings, and under bridges. As stated on page 3.4-36 of the Draft EIR, potentially suitable roosting locations exist within the Airport Study Area at the abandoned bunker and abandoned out-buildings; however, these locations would not be affected by the Proposed Project.

The commenter is correct in noting that pallid bats are also known to roost in trees. However, trees generally need to be large and/or senescent enough to support sufficiently-sized cavities that could provide potentially suitable roosting sites. Studies elsewhere have found that average measured tree widths known to support day or night roosts ranged from 2.2 to 3.4 feet diameter at breast height (DBH) and average heights were in excess of 80 feet.[39] Moreover, even where such cavities or hollows occur, they are often occupied by other animal species, which discourages pallid bat use. Nevertheless, there is a possibility that one or more marginally suitable tree roosting sites could occur in the oak woodland area of the Airport Study Area. Therefore, page 3.4-49, Mitigation Measure 3.4.12, new bullet of the Draft EIR is added as follows:

[38] Prior to the commencement of filling, this reach will be dewatered using upstream and downstream coffer dams. During the dewatering period, the Project Biologist will supervise the capturing and relocation of native aquatic fauna, including western pond turtles, to upstream and downstream locations. The exclusion fencing shall be placed across the coffer dam sites.

[39] Baker, M.D., M.J. Lacki, G.A. Falxa, P.L. Droppelman, R.A. Slack and S.A. Slankard. 2008. Habitat use of pallid bats in Coniferous forests in Northern California. Northwest Science 82(4):269-275.
Rabe , M.J., T.E. Morrell, H. Green, J.C. Devos Jr., and C.R. Miller. Characteristics of ponderosa pine snag roosts used by reproductive bats in Northern Arizona. Journal of Wildlife Management 62(2):612-621.

A qualified wildlife biologist shall conduct a pallid bat habitat assessment within the oak woodland area no more than six months prior to tree removal work. If evidence of occupied bat roosting sites is observed (e.g., guano, urine stains or roosting bats), then removal or trimming of the occupied tree, and any trees within a buffer zone to be determined in consultation with DFG, shall be delayed until the period when bats are active and young are able to fly (March 1 through April 15, and August 31 through October 15). The affected trees shall be trimmed and removed under the supervision of the Project Biologist in two phases, over two consecutive days. On the first day (in the afternoon), limbs and branches not containing occupied or suitable roost sites shall be cut with a chainsaw. On the second day, the entire tree will be removed.

A2-8 Page 3.4-44, Mitigation Measure 3.4.8, new bullet of the Draft EIR is added as follows:

Other Mitigation. If occupied American badger dens are found during the pre-construction surveys, additional measures will be identified and implemented subject to the approval of DFG, in order to ensure that all American badger impacts are mitigated to the level of less-than-significant.

A2-9 The commenter's summary of the proposed stream and riparian mitigation elements (as part of Mitigation Measures 3.4.10B, 3.4.10D and 3.4.11 on pages 3.4-47 through 3.4-49 of the Draft EIR) is not correct. The following is an accurate summary of what is proposed under these mitigation measures:

Impact Type	Impact Amount	Proposed Mitigation Measure
Stream channel (Airport Creek)	0.5 acre (approximately 1,500 linear feet)	Construct 0.5 acre (850 linear feet) new stream channel on-site
Jurisdictional willow scrub (Airport Creek)	0.2 acre	Establish 0.2 acre new jurisdictional willow riparian off-site
Non-jurisdictional riparian woodland and willow scrub (Airport Creek and Upper Ordinance Creek)	4.7 acres	Establish 4.7 acres new non-jurisdictional riparian woodland and willow scrub off-site

As shown above, all proposed mitigation is in-kind. The County acknowledges that the on-site replacement channel will replace stream aquatic habitat but will not fully replace the complex aquatic-riparian structure being affected. The new channel will be maintained as a relatively open canopied channel with herbaceous vegetation and low-statured riparian shrubs, in accordance with FAA guidance regarding runway safety. However, full replacement of the complex structure of aquatic habitat, riparian canopy, sub canopy and understory vegetation will be achieved through the additional proposed riparian woodland/willow scrub mitigation habitats. The County intends to establish these additional mitigation areas along existing stream corridors that currently lack such habitat, preferably in the Mark West Creek/Windsor Creek watershed area.

Page 3.4-47, Mitigation Measure 3.4.10B, new sentence of the Draft EIR is added as follows:

> The mitigation ratio provided hereunder constitutes a minimum required ratio that may be modified during the negotiation process with the regulatory agencies under the applicable permitting processes.

Page 3.4-48, Mitigation Measure 3.4.10D, new paragraph 2 of the Draft EIR is added as follows:

> The mitigation acreage listed above calls for replacement at a 1:1 ratio. The mitigation ratio provided hereunder constitutes a minimum required ratio that may be modified during the negotiation process with the regulatory agencies under the applicable permitting processes.

Page 3.4-49, Mitigation Measure 3.4.11, new paragraph 2 of the Draft EIR is added as follows:

> The mitigation acreage listed above allows for a replacement at a 1:1 ratio. The mitigation ratio provided hereunder constitutes a minimum required ratio that may be modified during the negotiation process with the regulatory agencies under the applicable permitting processes.

A2-10 Please see the response to comment #9 of this letter.

A2-11 Alternatives 7 and 10, which are presented on pages 4-14 and 4-17 of the Draft EIR, respectively, examined the possibility of re-routing the entire Airport Creek channel around the northern end of Runway 14 rather than confining a portion to a culvert. Alternatives 6 and 9, which are presented on pages 4-13 and 4-16 of the Draft EIR, respectively, examined the possibility of re-routing longer reaches of Airport Creek than the Proposed Project (1,200 linear feet and 2,900 linear feet, respectively). All four alternatives were rejected because they would not meet FAA runway safety area (RSA) and/or wildlife hazard requirements. Alternative 6 and 7 would not meet Congressionally-mandated safety standards because they would result in a sub-standard sized RSA, a circumstance not allowed under federal law when the option exists to construct an RSA to the minimum required size (see Public Law 109-115 and FAA Advisory Circular [AC] 150/5300-13). Alternatives 9 and 10 would meet the mandated safety standards but would nevertheless conflict with FAA requirements that airport projects not establish or result in new wildlife hazards (see FAA AC 150/5200-33). Additionally, all four alternatives would require routing of the new channel through the middle of the SACMA-2 wetland preserve, causing substantial additional impacts to seasonal wetlands and potentially suitable endangered plant habitat in this location.

The commenter is correct in noting that the area north of the runway already contains wetlands and ponds that are wildlife attractants. The FAA is requiring the Airport to address these wildlife attractants under the Airport's Wildlife Hazard Management Plan. Under no circumstances will the FAA allow the Airport to increase the current level of wildlife attraction by adding new habitat features to this area. In addition, such a re-routed open channel would have a greater magnitude of impacts to the existing wetlands within the SACMA-II Preserve and the existing ponds to the north of the approach end of Runway 14. Therefore, re-evaluations of Alternatives 6, 7, 9 and 10 are not warranted.

A2-12 Mitigation Measure 3.4.14 on page 3.4-51 of the Draft EIR has been revised to read (deleted text in ~~strikethrough~~ and new text in double underline):

> The County shall implement the following actions to mitigate the impacts associated with the loss of the wildlife movement corridor along Airport Creek.
>
> **Shrub and herbaceous planting along the 850-foot relocated stream channel.** Mitigation Measure ~~3.4.3~~ 3.4.10B calls for ~~the County to plant~~ planting of low statured shrub and/or herbaceous species along the relocated open channel banks in accordance with FAA guidelines for lands within and adjacent to the OFA. This replanting should allow for the development of partial channel cover that would be conducive to the passage of small wildlife.

With regard to the comment to include additional mitigation measures for impacts to the existing Airport Creek wildlife movement corridor, it is important to note that such additional measures are not technically possible due to the need to exclude hazardous wildlife from the Airport. As discussed in Impact 3.4.14 on pages 3.4-50 and 3.4-51 of the Draft EIR, the only feasible way to mitigate the loss of the existing corridor would be to recreate a new one on Airport property. However, recreating a wildlife corridor on the Airport would be inconsistent with the provisions of FAA AC 150/5200-33B, which requires eliminating (rather than facilitating) any existing or potential wildlife hazards. Such hazards would include wildlife corridors that allow movement across the Airport of large mammals, such as deer, that are known to be significant hazards to aircraft. Based on the FAA guidelines, the Proposed Project includes fencing to exclude deer and other large mammals from the Airport. If the County were to retain or recreate the existing wildlife corridor, the Airport would be out of compliance with requirements established by CFR Part 139. Therefore, degradation of a wildlife movement corridor is considered to be a significant impact that cannot be mitigated to the level of less-than-significant.

It is important to note that the Airport currently uses measures to minimize wildlife within Airport property. The Wildlife Hazard Assessment currently being completed by the Airport in compliance with FAA guidance also may result in additional measures being necessary.

Notwithstanding the above, the Draft EIR partially mitigates the wildlife corridor impacts to the extent feasible. The movement of aquatic organisms up and down Airport Creek will be maintained via the re-aligned creek channel and large culvert. Under Mitigation Measure 3.4.14, the movement of small (non-hazardous) wildlife species will be facilitated through the establishment of low vegetative cover along the re-aligned channel. Additionally, the Draft EIR provides off-site mitigation measures that may help off-set the loss of the on-site movement corridor for regional wildlife. Mitigation Measure 3.4.10D on page 3.4-48 of the Draft EIR and Mitigation Measure 3.4.11 on pages 3.4-48 and 4.4-49 of the Draft EIR would establish new riparian habitat off-site, preferably in the Mark West Creek/Windsor Creek vicinity. The new riparian habitat area would be located along other existing stream corridors, effectively enhancing these corridors for wildlife movement.

A2-13 Attempting to replant the total diameter breast height (DBH) of canopy, sub canopy and understory trees to be affected in the oak woodland areas is meaningless from an ecological perspective and would not assure that the impact would be mitigated to the level of less-than-significant. The mitigation goal is to not just replace trees, but to re-

establish oak woodland habitat. This goal can be achieved by planting and maintaining a sufficient number of individuals of seedling native trees to promote the gradual re-establishment and maturation of oak woodland habitat over time. The County believes that applying a 3:1 replacement ratio for native oaks and 1:1 replacement ratio for other native tree species (as required under Mitigation Measure 3.4.12 on page 3.4-49 of the Draft EIR) would allow for this re-establishment/maturation process, provided that the other elements of the mitigation measure are also implemented (e.g., irrigation, monitoring, long-term maintenance). Therefore, the County believes that Mitigation Measure 3.4.12 on page 3.4-49 of the Draft EIR would reduce the impact to oak woodland as well as individual oak trees to the level of less-than-significant.

COMMENT LETTER A3 - LETTER SUBMITTED BY THE TOWN OF WINDSOR
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TOWN OF
WINDSOR

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Vice Mayor
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Councilmembers
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Cheryl Scholar

Town Manager
J. Matthew Mullan

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SEP 19 2011
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

HAND DELIVERED

September 19, 2011

Crystal Acker
Sonoma County Permit and Resource Management Department (PRMD)
2550 Ventura Avenue
Santa Rosa CA. 95403

Subject: Comments on Draft EIR Sonoma County Airport Expansion

Dear Ms. Acker

Thank you for the opportunity to comment on the Sonoma County Airport Expansion EIR, also for Jon Stout's presentation to the Windsor Town Council on August 17, 2011. The Town continues to have substantial interest in this project, which will affect many families and residents throughout the Town.

As advised in the Town's July 8, 2008 response to the County's Notice of Preparation, the Town's main CEQA concerns are traffic congestion, noise, utilities, land use and greenhouse gas emissions. The Town appreciates the opportunity to comment on the Draft EIR and looks forward to seeing the responses to its comments, including any recirculation as may be required. Based on the current Draft EIR, and until the Town's questions are adequately addressed, the Town objects to certification of the EIR and to the approval of the project. However, the Town is hopeful its concerns for the environmental consequences of the project can be satisfactorily resolved.

Please accept the attached comments on the Draft EIR for review and response.

If you have any questions, please contact me at: (707) 522-8526.

Sincerely,

Steve Allen
Mayor

Cc: Town Council
Planning Commission
Matt Mullan, Town Manager
Rich Rudnansky, Town Attorney
Richard Burtt, Public Works Director
Jim Bergman, Planning and Building Director

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COMMENT LETTER A3 - LETTER SUBMITTED BY THE TOWN OF WINDSOR
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TOWN OF WINDSOR COMMENTS SONOMA COUNTY AIRPORT EXPANSION DRAFT ENVIRONMENTAL IMPACT REPORT

The Town of Windsor submits the following comments on the Draft EIR for the proposed Sonoma County Airport expansion. The Town has concern about traffic congestion, noise, utilities, land use and greenhouse gas emissions.

Traffic Comments:
In general, Section 3.12 of the DEIR lacks foundation for the calculations prepared and presented so it is difficult to determine the impacts of the proposed project.

1

1. **Please provide calculations and assumptions for review in the Final EIR.**
The Town was unable to find the calculations that supported the intersection level of service that are summarized in Tables 3.12-4, -6 & -9. As these calculations are not available, we would hope that the Town would have an opportunity to review these assumptions prior to the EIR being certified.

2

2. **Please provide further access evaluation or implement access restrictions for review in the Final EIR.**
The configuration of the project presents the opportunity for project added traffic together with construction related traffic to access the northwesterly corner of the airport from Windsor Road. Project trips and haul trucks during construction could logically use Shiloh Road to Windsor Road to access the airport property. For these reasons, it would appear that including the intersection of Shiloh Road/Windsor Road should also be evaluated in the EIR. If this evaluation is not included, we would suggest that a restriction of access to the airport property be imposed from Windsor Road or any other access that could potentially impact Shiloh Road, west of Skylane Boulevard or impact the intersection of Shiloh Road/Windsor Road.

3

3. **Please provide level of service calculations for review in the Final EIR.**
Potential impacts to the intersection of Shiloh Road/Skylane Blvd are identified in the analysis and a potential mitigation measure; adding an eastbound right turn lane on Shiloh Road (Mitigation 3.12-7) is included. Again these conclusions can not be verified without the supporting level of service calculations.

4

4. **Modify mitigation funds to identify the Town of Windsor as a recipient for the addition of bicycle lanes on Skylane Boulevard within the Town limits.**

1

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COMMENT LETTER A3 - LETTER SUBMITTED BY THE TOWN OF WINDSOR
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4 Mitigation Measure 3.12-11 identifies a fair share contribution by the County for the addition of bicycle lanes on Skylane Boulevard. A portion of Skylane Boulevard is within the Town of Windsor and the Town should be identified as the recipient of the mitigation funds.

Utility Comments:

5. **Provide estimates of the water demands for the Airport including Phase II.**
The DEIR does not currently contain any analysis of water use for the project as requested by the Town during the scoping of the EIR in 2008. The only mention of water use is included in the Final Initial Study which states on page 68 that the proposed uses "would not require a substantial increase in water use, and the available water supply is adequate to serve the needs of the project. No new or expanded water entitlements are needed for the AMP Project."

In recent discussions with county staff, the Town understands that the project description has been revised from the project description developed in 2008. Phase I (1-5 years) improvements are specifically restricted to safety related runway improvements which will not increase water use. We also understand that Phase II (8-10 years) will include the terminal expansion and construction of new hangers and other visitor related improvements which will increase water demand and which will have project specific environmental analysis at that time.

5 These staff discussions have resulted in the County engaging a consultant to determine the approximate water use for the Phase II improvements. These estimates will be refined at the time of the project specific DEIR for Phase II. We agree that it is appropriate for this DEIR to provide the best estimates for water demand for the Phase II improvements similar the analysis included in this DEIR for traffic.

The Town recently adopted its 2010 Urban Water Management Plan (UWMP) which projects water demands and supply needs through the year 2035. That plan relies on conservation, expansion of the urban recycled water system as well as increased supply from a variety of sources to provide for future water demands. The development of the UWMP required that the Town utilize the Sonoma County Water Agency's (SCWA) projections for water availability. In the Agency's 2010 UWMP, the SCWA indicated the Town can anticipate a reduction of Russian River supply from 5625 Acre feet per year (AFY) to 5200 AFY both for Russian River Diversions and Aqueduct deliveries. This results in a 425 AFY reduction in water supply committed to the Town by SCWA (equaling a reduction of 1,189 ESDs) and produces a supply deficit after the year 2025. The

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projected deficit is approximately 163 acre-foot per year (AFY) in 2030 increasing to about 459 AFY in 2035.

On August 17, 2011, the Town Council received an updated Water Supply Report which was based upon the water projections included in the Town's 2010 UWMP. That update provided information to the Council that there is a current deficit of water amounting to 52 Equivalent Single-family Dwelling units (ESD's) for the area served by Windsor Water District, which includes the Town, and unincorporated county areas of the Airport & business parks located around it as well as Mayacama & Shiloh Areas to the east of the Town. While the Town's Water Master Plan (adopted on September 7, 2011) does include improvements which will eliminate this deficit, these improvements are not yet funded and will be financed through Water Impact fees generated by future development. The Town is willing to work collaboratively with the County to develop needed water supplies for the Airport Service Area. 5

Because it is critical for the Town to accurately account for future growth and be assured that the capital infrastructure necessary to provide water in the future is properly financed, it is imperative that an estimate of the demands for the Airport be made; even for Phase II.

6. **Revise the Final EIR to include the use of recycled water**
Also in recent months, the Town has completed a Recycled Water Feasibility Study, conducted with SCWA, which identified at a concept level potential recycled water projects in the Airport Business Park area. We understand from staff that the Airport would like to be included in the use of recycled water and the DEIR should be revised to reflect that commitment. 6

7. **Revise the Final EIR to utilize 319 gallons per day ESD factor for water use as the Airport is served by the Town.**
The only discussion of wastewater impacts from the project is contained in the Final Initial Study. Wastewater services are provided by the Sonoma County Water Agency. The Initial Study suggests that currently the Airport and its associated uses (restaurant, private hangers etc.) currently provide 78 ESD's to the Airport-Larkfield-Wikiup Wastewater Plant. Town staff, in concert with information provided by the Agency has determined that currently 71ESD's are generated by the Airport. In these discussions, Town staff found that the agency uses a different generation factor to determine Agency Wastewater ESD's. Because there are no meters on discharge to the sewer system, an analysis is necessary to calculate the average indoor use of water which will eventually require treatment at the wastewater 7

3

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plant. The agency uses 250 gallons per ESD per day as their conversion factor based upon data generated in 1999.

Town staff complied data from those water accounts located on airport property from February 2003 through the present and determined that the Airport currently uses 83 ESD's using the conversion factor developed in the Town's 2010 Water & Wastewater Fee Study which sets the equivalent unit factors at 319 gallons per day per ESD for Water and 150 gallons per day in Wastewater which accounts for outside irrigation use which is not treated at the Wastewater plant.

7

We would request that the DEIR utilize the 319 gallons per day ESD factor for water use as the Airport is served by the Town.

8. **Implement mitigation measures to reduce glare associated with lighting.**
The project may result in substantial increases in sources of light and glare that may adversely impact nighttime views. Mitigation should be included to ensure that outdoor lighting, including illumination of streets, and parking lots is minimized through appropriate site design, dimming and shielding of light fixtures.

8

Noise Comments:
The citizens of the Town of Windsor are impacted more than any other community in Sonoma County by the extension of the runways to the north by exposure to noise from potentially more and larger aircraft. It is imperative that the Federal Aviation Administration, the Airport, the County of Sonoma and the Town of Windsor to continue to work cooperatively to reduce noise impacts to acceptable levels in an effort to maintain the high quality of life in the Town. To this end, the Town requests the following:

9. **Develop a mitigation measure aimed at establishing a volunteer flight curfew and alternating and shifting flight patterns away from residential land uses.**
The CNEL 55 contour line extends further into the residential neighborhoods in the southern portion of Windsor, as depicted on Figure 3.10-1. This will increase noise levels for Windsor residents. Mitigation should include a volunteer flight curfew prohibiting flights after 10 pm and establishing an alternating and shifting flight path as part of all new commercial service contracts. These mitigation measures should be included in the Final EIR for review.

9

10. **Develop a mitigation measure developing and implementing a noise abatement program that includes participation from citizens, the Town, the County and the airport.**

10

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10 To further mitigate noise generated from aircraft, a fly neighborly and Noise Abatement Program should be instituted and encouraged by airport management. Appointment of a committee representing citizens at large, the Town, County, and the Airport should be established to develop and implement the Noise Abatement program recommendations. These mitigation measures should be included in the Final EIR for review.

11. **Include a mitigation measure requiring noise attenuation studies and mitigation implementation through 2030.**
11 In an effort to assure and monitor assumptions from the draft EIR and to decrease significant noise impacts to existing Windsor homeowners, noise attenuation studies and the implementation of mitigation as a result of the monitoring should be established and continued through 2030. These mitigation measures should be included in the Final EIR for review.

Greenhouse Gas Emissions Comments:

12. **Mitigate Greenhouse Gas emissions by utilizing photovoltaic panels on airport properties**
12 To mitigate increased greenhouse gas emission generated by the expanded airport operation, the project should incorporate the use of photovoltaic panels to off set electric use.

Land Use Comments:

13. **Clarify potential land use restrictions for airport referral zones to allow assessment in the final EIR**
13 It is unclear what affect the revised and enlarged airport Referral Zone will have on land use restrictions in Windsor. The Town considers any further restrictions on land use a significant impact.

Conclusion:

The Town appreciates the opportunity to comment on the Draft EIR, and looks forward to seeing the responses to its comments, including any recirculation as may be required. Based on the current Draft EIR, and until the Town's questions are adequately addressed, the Town objects to certification of the EIR and to the approval of the project. However, the Town is hopeful its concerns for the environmental consequences of the project can be satisfactorily resolved.

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RESPONSES TO COMMENT LETTER A3 – LETTER SUBMITTED BY THE TOWN OF WINDSOR

A3-1 Synchro worksheets were emailed to the Town of Windsor traffic engineer, Mr. Allan Tilton, for review on 26 September 2011. In addition, the Synchro files are available on the Airport's website and at the Permit and Resource Management Department (PRMD) offices to anyone who wants to review them.

A3-2 The construction traffic analysis did not include the Windsor Road / Shiloh Road intersection because it is anticipated that all of the construction-related traffic would access the Airport from the east along the U.S. 101 corridor. However, to address the commenter's concern, the construction traffic management plan discussed in Mitigation Measure 3.12.1 on page 3.12-23 of the Draft EIR is revised to include a provision for construction truck traffic to avoid the Windsor Road /Shiloh Road intersection. Thus, page 3.12-23, paragraph 6, new sentence 2 is added as follows:

> The construction traffic management plan shall include provisions for construction truck traffic to avoid the Windsor Road / Shiloh Road intersection.

A3-3 See the response to comment #A3-1 of this letter, above.

A3-4 The County acknowledges that the designated Class II bicycle lane proposed for Skylane Boulevard falls within two jurisdictions. The fair share contribution towards construction of this bicycle facility will be proportionally split between the two jurisdictions. Page 3.12-28, Mitigation Measure 3.12.11 of the Draft EIR is revised to read (new text is in <u>double underline</u>):

> Prior to issuance of occupancy permits for the terminal, the County shall provide a fair share contribution toward provision of Class II bicycle lanes along Skylane Boulevard. <u>The funds shall be proportionally split and allocated to both the County of Sonoma Department of Transportation and Public Works and the Town of Windsor, as the proposed facility is located within both jurisdictions.</u> This would reduce the impact to a less-than-significant level.

A3-5 The Town of Windsor contends that the Draft EIR inadequately analyzes the domestic water use needs for the Proposed Project. Specifically, this comment incorrectly asserts that the Draft EIR contains no analysis of water use for the Proposed Project. As the comment itself acknowledges, the Initial Study prepared in accordance with CEQA Guidelines Section 15063 as part of the environmental review for the Proposed Project, and included as Appendix A to the Draft EIR, does analyze the Proposed Project's domestic water use. The Initial Study concluded that "no new or expanded water entitlements are needed" for the Proposed Project and, therefore, the impact on available water supply would be less than significant and "no further analysis is warranted in the EIR" (please see the page 68 of the Initial Study, which is presented as Appendix A of the Draft EIR).

Notwithstanding the Initial Study's conclusion, the County engaged Brelje & Race to perform a water needs assessment for the project implementation in response to concerns expressed by the Town Of Windsor. This assessment provides detailed

information regarding long term potable water requirements associated with full implementation of the Proposed Project.

The proposed project consists of (1) short-term project elements that would be implemented by 2015 (includes both Phase I and Phase II short-term project elements), which have been reviewed at a project level of analysis in the Draft EIR, and (2) long-term project elements that are planned to be implemented between 2015 and 2030, if at all, and which have been reviewed in the Draft EIR at a programmatic level of analysis. Summary listings of the project elements in each category are presented in Tables 2-5, 2-6 and 2-7 of the Draft EIR. Short-term project elements will involve work and acquisitions related to the extension of the two existing runways to mitigate existing safety concerns and provide adequate runway length to permit various models of regional jets to operate from the Airport. As discussed in more detail below, and as fully acknowledged by the comment, the short-term project elements do not include any new or expanded water consumption uses.

Long-term project elements are related to actions that may or may not be implemented depending on need and available funding. The principal long-term project elements include construction of a replacement airline passenger terminal, relocation of the aircraft rescue and firefighting (ARFF) building, and relocation of the air traffic control tower. An effort has been made to project water demands for the long-term projects even though current project details are limited and some of project elements may never be constructed. As stated in the Draft EIR, more focused project-level environmental analysis of each long-term project element will be undertaken by the County of Sonoma prior to any element being considered for approval and implementation. Due to the lack of specificity about a number of the project elements, assumptions made with respect to their impact on operations were made in consultation with Airport management staff. Even with full implementation of the Airport Master Plan Update, including the two office buildings which are not technically part of the Airport Master Plan, the water needs assessment demonstrates that the Proposed Project will result in no net-increase in long-term potable water use.

Existing Potable Water Demands

Potable water within the Airport Industrial Area is provided by the Town of Windsor. Potable water is delivered to the Airport facilities, and ancillary business located thereon, through 24 metered service connections. Airport Administration, temporarily located offsite in a building shared by other tenants, is served by a separate service connection not included in the foregoing count. Total employee count for all tenants in the building is 31, eight of whom are Airport administrative employees. A recap of water sales to the Airport complex and administrative office is shown in **Table A3-5-1**, together with **estimates** of maximum month sales (meters are read bi-monthly).

Projected Potable Water Demands – Short-Term Project Elements

Short-term project elements are limited to airfield safety improvements and lengthening of existing runways to accommodate regional jets. These project elements are anticipated to be completed by 2015. Although runway extension will facilitate addition of future commercial service flights over time, it would not immediately generate a substantial number of new flights beyond that which would be anticipated without the Proposed Project.

Table A3-5-1

HISTORICAL WATER SALES AND ESTIMATED MONTHLY USAGE (1,000 GALLONS)

		2010			2011				
User Description	**Service Type**	**8/15 – 10/15**	**10/15 - 12/15**	**12/15 - 2/15**	**2/15 - 4/15**	**4/1 5 -6/15**	**6/15 - 8/15**	**Annual Sales**	**Est. Max. Month**
Terminal	Dom/Irrigation	60	56	37	43	52	58	306	32
Terminal Lot	Irrigation	87	17	1	0	29	75	209	45
Terminal Addition	Dom/Irrigation	28	37	43	26	25	31	190	16
Restaurant	Domestic	33	34	32	32	30	36	197	19
Tower	Domestic	8	3	5	14	3	4	37	6
Shop	Domestic	1	1	2	2	1	3	10	2
Fire Station	Domestic	2	9	13	2	5	2	33	7
Car Wash	Other	17	6	22	5	8	8	66	11
Admin. Offices/a/	Dom/Irrigation	74	30	13	12	44	79	252	40
PCA Museum	Irrigation/Other	8	5	2	3	3	6	27	5
Becker Blvd Restroom	Dom/Irrigation	41	19	11	13	36	44	164	22
Private Hangers	Dom/Irrigation	156	139	37	38	96	218	684	80
Hangers 18 – 21	Dom/Irr/Other	8	5	6	6	18	19	62	10
Cal Fire	Dom/Irr/Other	245	261	107	27	32	106	778	150
Dragon Fly Aviation/B/	Dom/Irrigation	7	14	5	5	6	7	44	4
Kaiser Air	Dom/Irr/Other	134	76	7	38	57	63	375	40
North Coast Air	Dom/Irr/Other	6	7	4	2	3	4	26	4
Reach	Dom/Irrigation	81	37	21	38	31	60	268	42
Sonoma Jet Center	Domestic	25	16	9	10	20	37	117	20
Sonoma Jet Center	Irrigation	33	17	1	0	37	38	116	20
	Subtotals	**1,054**	**789**	**378**	**316**	**526**	**898**	**3,961**	**575**
FLS (Terminal)/c/	Fire	0	0	0	0	0	0	0	
FLS (by Hangers)	Fire	0	0	0	0	0	0	0	0
FLS (by New Shades)	Fire	0	0	0	0	0	0	0	0
FLS (by REACH)/d/	Fire	10	26	0	36	2	30	104	9
FLS (on Laughlin Rd)	Fire	1	5	0	7	0	6	23	2
	Subtotals	**11**	**31**	**0**	**43**	**2**	**36**	**127**	**11**

Notes:

/a/ Listed water use for administrative office includes domestic and irrigation usage at an offsite building that is shared with other tenants. Estimated average domestic water use is 208 gallons per day based on rainy season usage. It is estimated that 26% of that (54 gallons per day) is used by the 8 County administrative employees.

/b/ Listed water use for Dragon Fly Aviation for August 15 to October 15, 2010 is an estimate based on historical data. Actual water sales volume for the period was 245,000 gallons due to a water line leak.

/c/ Fire line service meters are **billed** but not always read on a bi-monthly basis.

/d/ See discussion in text.

Projected Potable Water Demands – Long-Term Project Elements

The proposed Master Plan Update Implementation Project would result in increased potable water demands for long-term project elements, associated changes in Airport operations, and future development that would potentially include:

- Increase in the number of annual inbound and outbound passengers served by the Airport from 200,000 to approximately 600,000 persons by 2030.
- Increase in the number of employees associated with public air travel operations from 70 persons to approximately 100 persons (admin, maintenance, FAA, security, airline staff, car rental personnel, etc.).
- Increase in the number of customers utilizing the restaurant. Note: Space allocated for the restaurant in the new terminal building is similar to the existing facility.
- Inclusion of a small wine tasting venue in the new terminal building.
- Increase in the number of visitors to the Pacific Coast Air Museum due to heightened awareness of the venue.
- Increase in car rentals (additional car washing required).
- Full-time staffing at the new ARFF building. The change to full-time staffing would be equivalent to adding approximately five persons, each working a 40-hour shift per week.
- Future construction of two office buildings on Airport-owned property with a combined floor area of 149,000 square feet[40].

The projected increase in potable water demands are summarized in **Table A3-5-2** and are discussed below.

Terminal

Passenger loads at the Sonoma County Airport vary seasonally. The Airport experiences its lowest patronage in January with historically approximately 6% of annual passengers flying that month. The highest patronage occurs in mid-summer with approximately 9.75% of the annual passengers using the facility during the peak month (July). Because the Airport is a regional facility, passengers tend to live closer to the Airport than the typical passenger using an international airport. The average time a passenger spends at the terminal is much shorter, and the demands for ancillary services (restroom, food and beverage, transportation, etc.) are less. Not all passengers necessarily utilize a restroom, especially arriving passengers who have to travel a short distance to get home. Because the time required between check-in and departure is not long, only a small percentage of passengers utilize the restaurant and most choose only to have a beverage. Most meals are served to patrons who originate from the neighboring business park, and the patron mix is not expected to change significantly over time.

Assuming that 80% of passengers utilize a restroom, the approximately 400,000 additional incoming and outgoing passengers would generate 360,000 additional restroom visits at the terminal. Assuming average water use of 1.6 gallons per restroom visit for new passengers (high efficiency urinal and toilets, and motion control plumbing

[40] The two office buildings are not part of the proposed project and may be fully built under existing zoning. However, they would be located on property owned by the Airport, and were included for purposes of fully studying potential future potable water demands associated with the Airport.

would be used in the new terminal), and a decrease of approximately 0.8 gallons per visit for the estimated 180,000 restroom visits that currently occur at the existing facility, the estimated increase in annual domestic water demands is 432,000 gallons. Future maximum month usage as a percentage of the total would be expected to change.

Table A3-5-2
Projected Increase[/a/] in Potable Water Demands (Gallons)

User Description	Annual	Max Month[/b/]
New Terminal (300 percent increase in passengers)	432,000	42,100
Airport Employees (30 person increase)	3,700	100
Restaurant and Wine Tasting Venue (50 percent increase)	100,000	9,800
Pacific Coast Air Museum (50 percent patronage increase)	1,500	200
Car Rental Business (50 percent increase in fleet size)	33,000	3,000
New ARRF Building (3 shift/day staff increase)	18,300	1,500
New Office Buildings (149,000 square feet) [/c/]	1,208,100	102,600
Totals	**1,793,600**	**159,300**
Gallons Per Day	**4,914**	**5,310**

/a/ Projected increases reflect use of high efficiency fixtures in new facilities.

/b/ Maximum month for all users is July or August except for car rental business. Listed usage for car rental business is that volume projected to occur during maximum month for all other uses.

/c/ The two office buildings are not part of the proposed project and may be fully built under existing zoning. However, they would be located on property owned by the Airport, and were included for purposes of fully studying potential future traffic impacts associated with any Airport activities.

Administration

Domestic water use by Airport administrative employees is presently estimated to be less than 7 gallons per day. It is reasonable to assume that any significant increase in personnel associated with Airport operations would occur in conjunction with or following construction of a new terminal and associated facilities. The new terminal would be expected to utilize high efficiency restroom fixtures to reduce potable water use. As a result, it is expected that potable water demands of both current and new employees would be reduced to 5 gallons per employee per day or less. The reduction in potable water use by the existing 70 employees would nearly offset the additional 30 (current demand of 178,850 gallons per year versus 182,500 gallons per day in the future). Should the employee growth occur prior to construction of a new terminal (assumes new employees would be located elsewhere within the business park), potable water demands could potentially increase by 76,650 gallons per year or 6,400 gallons per month as a result.

Restaurant & Wine Tasting Center

Current space planning for the new terminal provides for a restaurant of similar size to the existing facility and also includes a small wine tasting venue. Based on the prior discussion regarding the restaurant's patron mix, the anticipation that the wine tasting venue will, for the most part, be frequented by persons who would otherwise patronize the restaurant bar, and use of high efficiency appliances and plumbing in the new facilities, it is reasonable to expect that the potable water demands for both facilities will be no more than 150% of the existing restaurant. Annual potable water use by the restaurant is currently just less than 200,000 gallons per year. The anticipated increase in potable water use at the restaurant and wine testing venue would therefore be no more than 100,000 gallons per year, about 9,800 gallons of which would be used during July, the month when the most passengers pass through the facility.

Museum

The Pacific Coast Air Museum occupies a small area northerly of Becker Blvd and just west of Laughlin Road in the southeast area of the Airport. The primarily outdoor facility draws just under 6,000 visitors a year, exclusive of the annual Air Show it organizes and sponsors each August. That multi-day event draws between 20,000 and 25,000 persons each year and is held on another portion of the Airport property. Portable restroom facilities are brought in for the event.

Potable water use associated with the museum is provided by two services. The museum complex service meters water used for landscape irrigation and consumed at a drinking fountain. There are not any restrooms in the museum complex. The nearest restrooms are located nearby on Becker Blvd. and water for the restrooms is provided by another service.

While it is unknown how many museum visitors frequent the restrooms on Becker Blvd., some percentage must and the restrooms are certainly used by museum volunteer staff. It is anticipated that increased traffic through the Airport will translate into an increased awareness of the museum and the number of annual visitors will rise. Presently approximately 6,000 persons visit the venue annually, approximately 700 during the busiest month. If it is assumed that that number of visitors will increase by 50% over the lifetime of the project and that 25% of the visitors will utilize the restrooms, the potential increase in potable water demands would be no more than 1,500 gallons per year (2 gallons per restroom visit assuming current plumbing fixtures were retained) or 200 gallons during the busiest month.

Car Rental Facilities

A portion of the increased number of airline passengers will need rental ground transportation. Although the total number of passengers is expected to triple over the life of the project, the increase in ground transportation needs are expected to be much less. Most of the passenger growth is anticipated to consist of local residents that will use the Airport because of the additional destination and connection opportunities rather than driving to an airport in the bay area. While the actual increase in ground transportation needs is unknown at this time a 50% increase over current usage is proposed to project the increase in potable water demands. Relocation and/or expansion of the current vehicle washing facilities would provide an opportunity to incorporate the latest advances

in technology with respect to water recycling and reuse and help to mitigate the increase.

Annual water usage at the car wash is currently 66,000 gallons. An additional 33,000 gallons would be needed to accommodate a 50% increase in the rental fleet if vehicle washing practices remained the same. It should be noted that the highest water usage period (rainy season) does not coincide with the highest water use for other activities on the Airport, which general occurs in July or August. Based on historical water usage patterns at the facility, the monthly increase in water usage during July and August (months of maximum usage for nearly all other activities) would be approximately 3,000 gallons.

Aircraft Rescue and Fire Fighting Building

The new Aircraft Rescue and Fire Fighting (ARRF) building would replace an undersized facility that has reached the end of its useful life. The new facility would be designed to enhance the effectiveness and efficiency of emergency services personnel and equipment so that response times to the expanded runways are no longer than those currently experienced. Currently the building is staffed 15 minutes prior to commercial arrivals to 15 minutes after departures, which occur between the hours of 5 a.m. and approximately 10 p.m. It is anticipated that staffing would increase to provide for a 24 hour, seven day a week presence. This would require the equivalent of 4 to 5 additional full-time staff. Domestic water demands for the new facility could be as much as 50 gallons per day greater than at present, as the building would include a kitchen. Annual potable water demands are projected to increase by approximately 18,300 gallons and the monthly demand by approximately 1,500 gallons. Demand would be generally be consistent throughout the year.

Future Office Buildings

The Airport includes lands outside the access controlled area that is designated for future development of office space. Two buildings are envisioned with a combined floor area of 149,000 square feet. Assuming an employee density of 1 employee per 225 square feet (10% greater than the required parking space ratio for office space), up to 662 employees could potentially be added to those already working on Airport property. The Airport intends to utilize disinfected tertiary effluent or onsite groundwater to satisfy any associated irrigation demands for the facilities. The projected increase in domestic water demands associated with the 662 employees would be 3,310 gallons per day (5 gallons per employee) assuming the buildings are equipped with high efficiency plumbing fixtures.

The projected increases in domestic water demands of various Airport operations as a result of implementation of the project are summarized in Table 2. No increase in the use of potable water for irrigation purposes is expected. The projected increase in annual domestic water demands, absent mitigation, is estimated to be 1.8 million gallons. The projected increase in potable water demands during the month of maximum usage is 159,300 gallons or approximately 5,100 gallons per day. This amount is equivalent to the demand of 16.1 ESD's (equivalent single family dwelling unit) as defined by the Town of Windsor.

Impacts and Mitigation Measures

Short-Term Project Elements

As shown in Table 2, all projected increases in water usage are associated with long-term project elements, primarily construction of the new terminal and related facilities, and the predicted increase in commercial passengers using Airport facilities over the 20-year life of the Airport Master Plan. No mitigation is warranted.

Long-Term Project Elements

Long-term project elements could result in a significant increase in potable water usage. However, the Airport is exploring a variety of project design features to reduce potable water demand associated with long-term project elements. The following list includes water-conservation measures that the Airport has been considering for future project elements that, if implemented, would reduce potable water demands associated with the Master Plan Update Implementation Project to a less than significant impact. These measures are in addition to the utilization of high efficiency plumbing fixtures in all new buildings. Each measure is described in more detail below.

- Develop a well and pumping facilities on the Airport to accomplish landscape irrigation.
- Implement a project that would make disinfected tertiary effluent available for use on the Airport to replace potable water use at a number of landscape sites.
- Dual-plumb the terminal so that toilet and urinal flushing is accomplished using onsite groundwater or disinfected tertiary effluent. It would not be necessary to utilize waterless urinals if this mitigation measure was implemented although it would be desirable to reduce wastewater volumes.
- Dual-plumb the new office buildings so that toilet and urinal flushing is accomplished using onsite groundwater or disinfected tertiary effluent.
- Retrofit all other restroom facilities on the Airport with high efficiency fixtures.

Irrigation

The greatest opportunity for reducing potable water use at the Airport would be to eliminate, or at least significantly reduce, the volume of potable water used for landscape irrigation, regardless of whether that is achieved using onsite groundwater or disinfected tertiary effluent. A partial list of locations on the Airport where an alternative source for irrigation could be used, and a conservative estimate of the potable water offset, is presented in **Table A3-5-3**. Maximum irrigation demands typically occur in July. Additional offset opportunities exist on the Airport but have not been listed due to the lack of specifics that would allow the potential offset to be quantified.

The potential volume of potable water offset was determined from meter readings at those locations where a dedicated irrigation meter was present. A site review was conducted of the remaining areas. The extent and types of landscaping were noted (lawns, shrubbery, etc); irrigation demands estimated using 30 inches per year for lawn areas and 3 inches per year for areas where drip irrigation is utilized. The result was then compared to the seasonal changes in metered water use to verify that the estimated irrigation usage was conservative. In all cases this method appeared to

generate a conservative result. The only area where this approach was not used was at the private hangars where the landscape areas could not be easily quantified. The estimated landscape irrigation requirement at the private hangars is based solely on a review of historical water sales and the seasonal changes thereto.

Table A3-5-3
Projected Offset in Potable Water Demands for Irrigation (Gallons)

User Description	Annual Offset	Max Month Offset
Terminal Parking Lot and Drop Off Area Landscape	122,000	38,000
Terminal Landscape	7,000	1,200
Private Hangers	300,000	50,000
Cal Fire	155,000	26,000
Kaiser Air	50,000	8,500
Reach	64,000	11,000
Sonoma Jet Center	116,000	19,000
Totals	**814,000**	**153,700**
Gallons Per Day	**2,230**	**5,123**

The analysis of projected potable water needs suggests that under the worst case scenario (no potable water saving measures are incorporated into the Proposed Project) and using the Town's suggested 319 gallons per day per equivalent single-family dwelling unit (ESD), the Proposed Project will result in an increased water demand equivalent to six ESDs. This is not considered to be a significant increase in water demand.

The analysis also considered measures that would reduce potable water demands associated with the Proposed Project. The following measures are in addition to the use of high efficiency plumbing fixtures in all new buildings:

- develop a well and pumping facilities on the Airport to accomplish landscape irrigation;
- implement a project that would make disinfected tertiary effluent available for use on the Airport to replace potable water use at a number of landscape sites;
- dual-plumb the terminal so that toilet and urinal flushing is accomplished using onsite groundwater or recycled water; and
- retrofit all other restroom facilities on the Airport with high efficiency fixtures.

Potential offsets from the proposed measures are summarized below.

Dual Plumbing

The next most significant opportunity to offset potable water demands for the project would be to install dual plumbing in the new terminal and office buildings and plumb either disinfected tertiary effluent or onsite groundwater to toilets and urinals. The annual

increase in potable water demand in the new terminal lavatories as compared to existing usage was previously estimated to be 432,000 gallons. A large percentage of this increase (all but approximately 0.75 gallons per restroom visit for hand washing) could be eliminated if the facility was dual plumbed with groundwater or disinfected tertiary effluent. Dual plumbing toilets and urinals in the new terminal would reduce potable water usage by approximately 459,000 gallons per year, more than the projected increase (see **Table A3-5-4**).
Dual plumbing toilets and urinals in the new office buildings would reduce potable water demands from an estimated 5 gallons to 3 gallons per employee per day resulting in an annual reduction in demands of 483,300 gallons.

An inventory of existing plumbing fixtures in lavatories at the various venues and businesses located on the Airport reveals that additional potable water savings could be obtained if a fixture retrofit program were implemented that involved high efficiency units. Savings from such a program would range from 10 to 20 percent based on the type of fixtures that are currently in use. Because the total volume of potable water used for this activity is small, no attempt was made to quantify the annual potable water savings that would be achieved.

Table A3-5-4
Projected Offset in Potable Water Demands for Dual Plumbing

User Description	**Annual (Dual Plumbing)**
New Terminal (300 percent increase in passengers)	459,000
Airport Employees (30 person increase)	0
Restaurant and Wine Tasting Venue (50 percent increase)	0
Pacific Coast Air Museum (50 percent patronage increase)	0
Car Rental Business (50 percent increase in fleet size)	0
New ARRF Building (3 shift/day staff increase)	0
New Office Buildings (149,000 square feet) /c/	483,300
Totals	**942,300**
Gallons Per Day	**2,581**

Summary

A number of significant changes in Airport operations are anticipated over the next 20 years as a result of the Master Plan Update Implementation Project. The most evident will be an increase in commercial airline traffic and the projected tripling of the number of passengers using the facility. Absent incorporation of appropriate mitigation measures, the project will increase the demand for water. The Town of Windsor, as the water supplier for the area, has communicated concerns that it may be unable to accommodate the project's potable water demand. While this issue was analyzed in the Initial Study (where it was determined that no further analysis was warranted), an analysis of project potable water needs suggests that under the worst case scenario (no

potable water saving measures are incorporated into the project), the project will result in an increased water demand equivalent to 16 new residences. The short-term project elements do not include improvements that will increase water demand. For those impacts associated with long-term project elements that cannot be predicted without undue speculation or for which the deferral of specific analysis is appropriate, a more detailed project-level review will be conducted when the precise scope, design, and location for a particular element is more clearly defined and brought forward for public review. The Draft EIR fully commits the County to conducting a further CEQA-compliant environmental review prior to the approval and implementation of each long-term project element. As part of this review the County will implement all feasible project design features and/or mitigation to reduce potable water usage associated with long-term project elements to a level of less than significant. As the analysis set forth above indicates, the implementation of two or more of the project design measures under consideration by the Airport, most notably elimination or reduction in potable water use for landscape irrigation and installation of dual plumbing in the new terminal, would result in a minor increase in potable water demands of approximately 103 gallons per day (see **Table A-3-5-5**). These measures are considered the most easily implemented of those that were identified and could readily be accomplished using either onsite groundwater or disinfected tertiary effluent obtained from the nearby County wastewater facility.

Table A3-5-5
Summary of Water Demands

	Annual	Gallons per Day
Increase in Potable Water Demand	1,793,600	4,914
Irrigation Offset	-814,000	-2,230
Dual Plumbing	-942,300	-2,581
Totals	**37,300**	**103**

A3-6 The Airport is considering the use of recycled water for the terminal and the landscaping in the terminal vicinity. A final decision regarding the use of recycled water will be made when the new terminal building is designed. A project-specific environmental review document will be prepared at that time and the description of the use of recycled water will be included in the project-specific environmental review document.

A3-7 The water needs assessment acknowledges the Town's request and uses 319 gallons per day ESD for the water demand analysis (see Master Response F on page 4-17).

A3-8 As stated on page 3.1-7 of the Draft EIR, the County's adopted standards already require the use of downward-facing lights, light shields, and amber lumens to prevent potential glare associated with long-term project elements. The change in lighting associated with short-term project elements are all related to airfield lighting. These light sources are intended to be visible to pilots and, for obvious safety reasons, will not be subject to any downward-facing lights, light shields, or amber lumens. The Draft EIR concluded that all of these changes to airfield lighting would not be significant and that no mitigation measures are required.

In addition, all airfield lighting would follow the guidelines in FAA Advisory Circular 150/5345-46D, Specification for Runway and Taxiway Light Fixtures to ensure that the airfield is visible to pilots and to minimize any nighttime glare in the Airport vicinity.

A3-9 Impact 3.10.5 on pages 3.10-34 through 3.10-44 of the Draft EIR addresses the projected change in noise contours for the year 2030. The 2030 CNEL noise contours associated with the Proposed Project are shown in Figure 3.10-10 on page 3.10-37 of the Draft EIR. For comparison, the 2030 CNEL noise contours without the Proposed Project are shown on Figure 3.10-11 on page 3.10-38 of the Draft EIR. In comparing these two graphics, the CNEL contours would extend further into the southern portion of the Town of Windsor.

Mitigation Measure 3.10.5 on page 3.10-45 of the Draft EIR indicates how the County would mitigate the aircraft noise-related impacts associated with the Proposed Project. This mitigation measures states the following:

> In accordance with Policy AT-3f of the Air Transportation Element (ATE) of the Sonoma County General Plan, the County shall develop a Runway Approach Protection Plan. The Approach Protection Plan shall provide for noise monitoring where appropriate and shall identify appropriate mitigations to be undertaken in the event noise standards are exceeded. These mitigations may include purchase assurance, acoustical treatment, and purchase of easements. With implementation of appropriate noise attenuation, the impact of the projected change in noise contours would be reduced to a less-than-significant level.

The federal Airport Noise and Capacity Act of 1990 (ANCA) and FAA Regulations Part 161 have an effect on the implementation of certain types of noise mitigation measures. For example, ANCA precludes the Airport from imposing a mandatory curfew on nighttime air carrier flights. However, the Airport can and will work with airlines to obtain their agreement to implement a voluntary nighttime curfew, but to comply with FAA regulations and ANCA, such voluntary curfews cannot be imposed as mitigation. In order to constitute mitigation under CEQA, measures must be feasible, legally enforceable, and necessary to reduce an identified impact. A voluntary measure does not satisfy this criterion. Imposing the voluntary curfews as mitigation renders them mandatory and, thereby, unenforceable under ANCA. Thus, while the County may impose a project condition on the Airport requiring it to endeavor to obtain compliance from aircraft operators with a voluntary nighttime curfew, such a requirement may not be properly imposed as a mitigation measure under CEQA.

Additionally, the FAA is solely responsible for the vectoring and sequencing of aircraft within the airspace approaching the Airport. Once aircraft are near the Airport they are required to fly established procedures in the air traffic pattern to ensure a safe and orderly approach to landing. Although the FAA and the Airport coordinate activities frequently, airspace control and management is the sole responsibility of the FAA. Any change in departure or arrival flight paths can only be approved and implemented by the FAA. The Airport can and will work with FAA and the affected communities to address flight pattern issues and proposals; however, the Airport cannot unilaterally impose restrictions on the flight of aircraft in commercial service contracts.

The Airport has, at the request of and working with the Town of Windsor, sought and received approval from the FAA for a right-hand traffic pattern to Runway 14 during the times that the Air Traffic Control Tower is closed, raised the standard aircraft traffic pattern for light aircraft from 800 feet above ground level (AGL) to 1,000 AGL, and raised the pattern for large aircraft from 1,200 feet AGL to 1,500 AGL.

A3-10 Impact 3.10.5 on pages 3.10-34 through 3.10-45 of the Draft EIR addresses the projected change in noise contours for the year 2030. The 2030 CNEL noise contours associated with the Proposed Project are shown in Figure 3.10-10 on page 3.10-37 of the Draft EIR. For comparison, the 2030 CNEL noise contours without the Proposed Project are shown on Figure 3.10-11 on page 3.10-38 of the Draft EIR.

Mitigation Measure 3.10.5 on page 3.10-45 of the Draft EIR indicates that the County would develop a Runway Approach Protection Plan, which will identify appropriate mitigations to be undertaken in the event noise standards are exceeded.

The Airport has used the committee approach in the past for the creation of fly neighborly and noise abatement procedures for the Airport. In 2006, the Airport worked with a committee of Airport users, neighbors and Town of Windsor representatives to create the Charles M. Schulz – Sonoma County Airport Noise Management Program that was published in October 2006.

In connection with implementing ATE Policy AT-3f, the Airport will establish a committee to assist in developing and implementing noise abatement recommendations. The committee will represent members of the Airport community, including citizens at large, the Town of Windsor, the County, the Airport, the FAA, and Airport users.

A3-11 As discussed in the response to comment #A3-9 of this letter, Mitigation Measure 3.10.5 addresses the projected change in noise contours for the year 2030. In accordance with Policy AT-3f of the Air Transportation Element (ATE) of the Sonoma County General Plan, the County will develop a Runway Approach Protection Plan. The Approach Protection Plan will provide for noise monitoring where appropriate and shall identify appropriate mitigations to be undertaken in the event noise standards are exceeded. These mitigations may include purchase assurance, acoustical treatment, and purchase of easements. With implementation of appropriate noise attenuation, the impact of the projected change in noise contours would be reduced to a less-than-significant level.

As discussed in the response to comment #A3-10 of this letter, in connection with implementing ATE Policy AT-3f, the Airport will establish a committee representing the members of the Airport community to assist in reviewing and making revisions to the Airport's Noise Management Program as revisions are needed. The committee could be called upon in connection with the implementation of Mitigation Measure 3.10.5. In connection with developing the Noise Management Program, the Airport approached the FAA regarding funding for an FAR Part 150 Noise Exposure and Land Use Compatibility Study and was advised that FAA was unlikely to provide funding.

A3-12 As stated on page 5-4 of the Draft EIR, a solar panel farm is being considered as a short-term project at the Airport. This project would be subject to environmental review documentation in compliance with the California Environmental Quality Act (CEQA).

In addition, for a discussion of GHG emissions and additional measures being implemented by the Airport, please see Master Response C on page 4-7.

A3-13 As stated on pages 3.9-6 through 3.9-10 of the Draft EIR, implementation of the Proposed Project will necessitate amendment of the 2001 Comprehensive Airport Land Use Plan (CALUP) by the Airport Land Use Commission (ALUC). Although the Draft EIR identifies the probable changes that would be needed to the CALUP, the decision as to the ultimate zone configurations and compatibility criteria will be at the discretion of the ALUC, in consultation with the affected local agencies. With this in mind, the analysis below indicates the potential implications that the Proposed Project would have on the Town of Windsor's land use plans.

In terms of understanding the results of this review, it is important to note that although the Town of Windsor's 2015 General Plan references the 2001 CALUP, implementation of the CALUP noise and safety criteria is accomplished by means of the Airport Safety (AS) overlay zoning district. As such, an existing land use normally allowed in the primary zoning district that would conflict with the compatibility criteria of the amended CALUP would not result in a nonconforming use under the Town's zoning ordinance. Furthermore, in accordance with state law (Public Utility Code Section 21674(a)), the policies of the amended CALUP would not apply to existing land uses, whether or not they are consistent with the amended CALUP criteria. Therefore, amending the CALUP would have a less than significant impact on the Town's existing and planned land uses.

A preliminary review of the Town's land use plans indicates that there would be no direct conflict with the amended CALUP for the following reasons:

1. the noise contour zones would shrink in size;
2. the overflight area would shift in proportion with the proposed runway extensions but remain within the current ALUC Referral Area Boundary;
3. the airspace protection zones would shift in proportion with the proposed runway extensions but would not necessitate lower height restrictions than already established in the Town's zoning ordinances; and
4. the CALUP or *Handbook* safety zones would shift to reflect the proposed runway extensions but no additional restrictions would be placed on future land uses as:
    a. the properties are developed and thus, would not be subject to the amended CALUP; or
    b. the Town's planned land use designations would be consistent with the amended CALUP criteria provided that future development is built at the low end of the allowable density/intensity permitted under the Town's general plan.

Nevertheless, should the CALUP be amended by the ALUC, the Town of Windsor would need to modify its general plan to reference the new CALUP by name and adoption date, as well as incorporate the ultimate compatibility zones and criteria adopted by the ALUC to address noise, safety, airspace protection, and overflight hazards. The alternative would be for the Town of Windsor to take steps to overrule the ALUC by 2/3 vote of its governing body. The specific changes to the Town of Windsor's 2015 General Plan are listed in Mitigation Measure 3.9.2 on page 3.9-12 of the Draft EIR. The review of the Town's land use plans is summarized below.

Noise—The Town of Windsor's 2015 General Plan references the CALUP noise contours reflecting 225,000 annual aircraft operations by 2010. Policy D.1.4 of the 2015 General Plan indicates that "the Town should not permit residential development within the 60 dB contour of the Sonoma County Airport."

The proposed noise contours, which represent 127,173 annual operations by 2030, were compared with the CALUP noise contours. Within the Town of Windsor, the proposed 2030 noise contours would be smaller than those of the CALUP (see **Figure A3-13-1**). A contraction in the noise contours would move certain areas outside of the noise contours or into a less restrictive noise contour zone. For the Town of Windsor, the proposed 2030 noise contours would be less restrictive than the current CALUP contours.

Overflight—As discussed in the Draft EIR, the overflight areas under the Proposed Project would be fully encompassed in the current CALUP Referral Area established by the ALUC and implemented by the Town of Windsor. No additional restrictions would be placed on land uses.

Airspace Protection—As noted in the Draft EIR, although the airspace surfaces would shift north, the resulting height limits would not be lower than that established in the Town of Windsor's zoning ordinances.

Safety—For the purposes of this EIR, two approaches were analyzed in regards to the safety zones. The first approach applies the 2001 CALUP safety zones to the proposed northerly runway extensions of Runways 14 and 19. The second approach applies the sample safety zones provided in the current *California Airport Land Use Planning Handbook (Handbook)*[41] to the proposed runway ends. Again, the ultimate configuration of the safety zones will be at the discretion of the ALUC.

CALUP zones—The 2001 CALUP safety zones are based upon criteria and guidance provided in the FAA AC 150/5300-13[42], FAR Part 77[43] and the 1983 edition of the state *Handbook*. The Proposed Project would necessitate modifying the six CALUP safety zones to reflect the proposed extensions of Runways 14 and 19 (see **Figure A3-13-2**). This northerly shift would move certain areas inside of the safety zones or into a more restrictive safety zone. However, a review of planned land uses indicates that the shifted CALUP safety zones would not restrict future land uses within the Town of Windsor for the following reasons:

1. the General Plan land use designations are consistent with the CALUP criteria (e.g., Open Space, Estate Residential/Low Density Residential (0.2–3 du/ac[44])); or
2. areas that would allow more intensive development under the general plan (e.g., Surrounding Residential/Low-Medium Density Residential (3-6 du/ac), General Commercial) are developed and thus, would not be subject to the CALUP criteria.

[41] *California Airport Land Use Planning Handbook* published by the California Department of Transportation, Division of Aeronautics in January 2002
[42] Federal Aviation Administration, Advisory Circular 150/5300-13, *Airport Design*
[43] Federal Aviation Regulations Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*
[44] Dwelling units per acre

***Handbook* zones**—As discussed in the Draft EIR, the sample safety zones in the current 2002 *Handbook* are applied to the Proposed Project for comparison purposes (see **Figure A3-13-3**). Although the *Handbook* safety zones differ significantly in shape and size from those in the current CALUP, essentially the same geographic area that would be covered by the shifted CALUP safety zones would be affected by the *Handbook* safety zones. Although the *Handbook* safety guidelines would be slightly more restrictive than the CALUP criteria, the areas that would exceed the *Handbook* guidelines are developed. The only exception is a 12-acre area located approximately 2 miles north of Runway 14. This 12-acre site is located in the Town of Windsor's Sphere of Influence and has a planned land use designation of Estate Residential/Low Density Residential (0.2–3 du/ac). The *Handbook* guidelines recommend restricting residential development to 1 dwelling unit per 2 – 5 acres (0.5 – 0.2 du/ac). As such, this 12-acre area could be developed at the lowest density permitted under the Town's General Plan. Therefore, the *Handbook* safety zones would not restrict future land uses within the Town of Windsor for the following reasons:

1. the General Plan land use designations are consistent with the amended CALUP/*Handbook* criteria (e.g., Open Space, Light Industrial, Estate Residential/Low Density Residential (0.2–3 du/ac)), provided that they are developed at the low spectrum of the allowable density/intensity; or
2. areas which would allow more intensive development under the general plan (e.g., Surrounding Residential/Low-Medium Density Residential (3-6 du/ac), General Commercial) are developed and thus, would not be subject to the amended CALUP.

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Figure A3-13-1

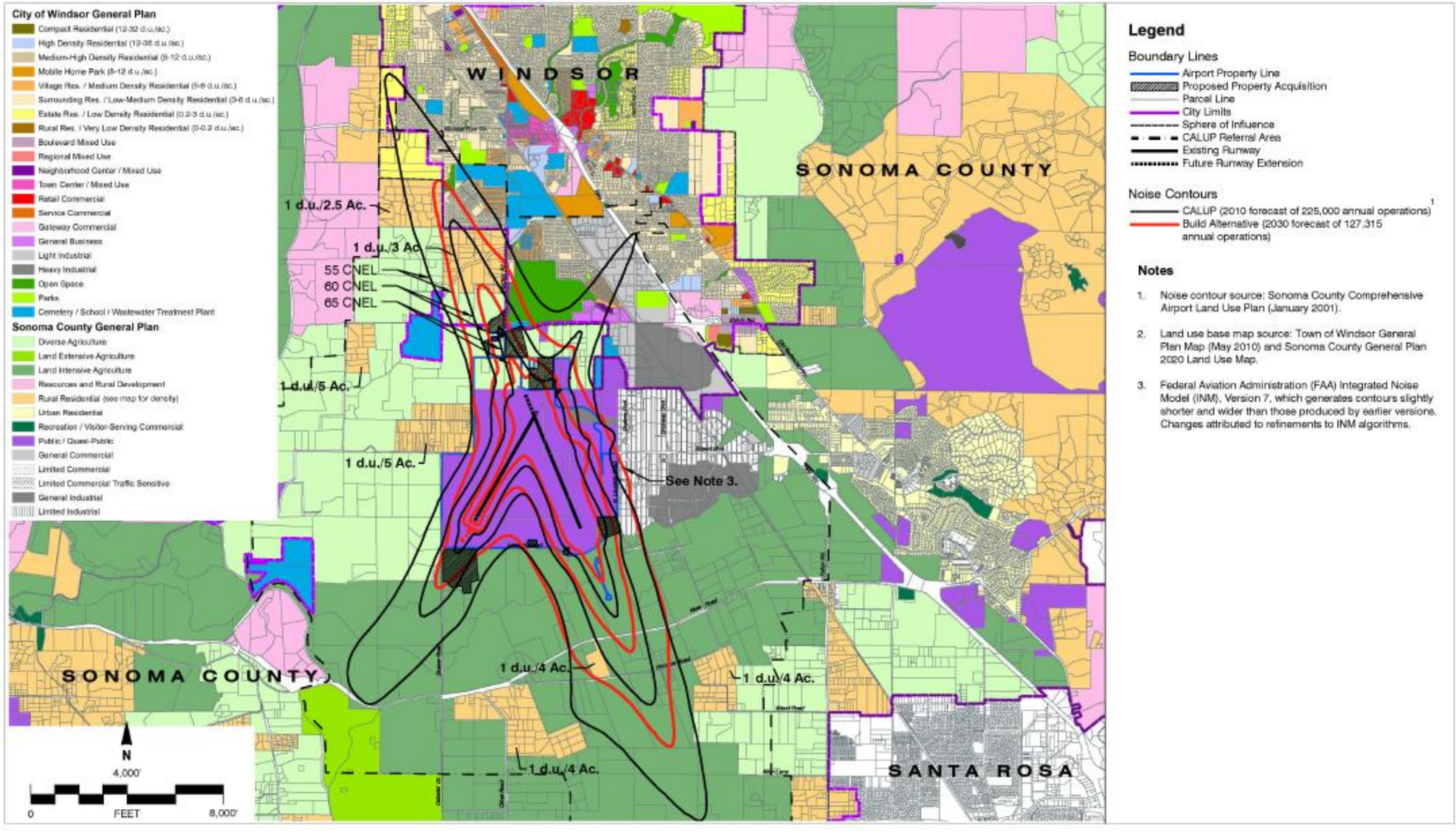

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Figure A3-13-2

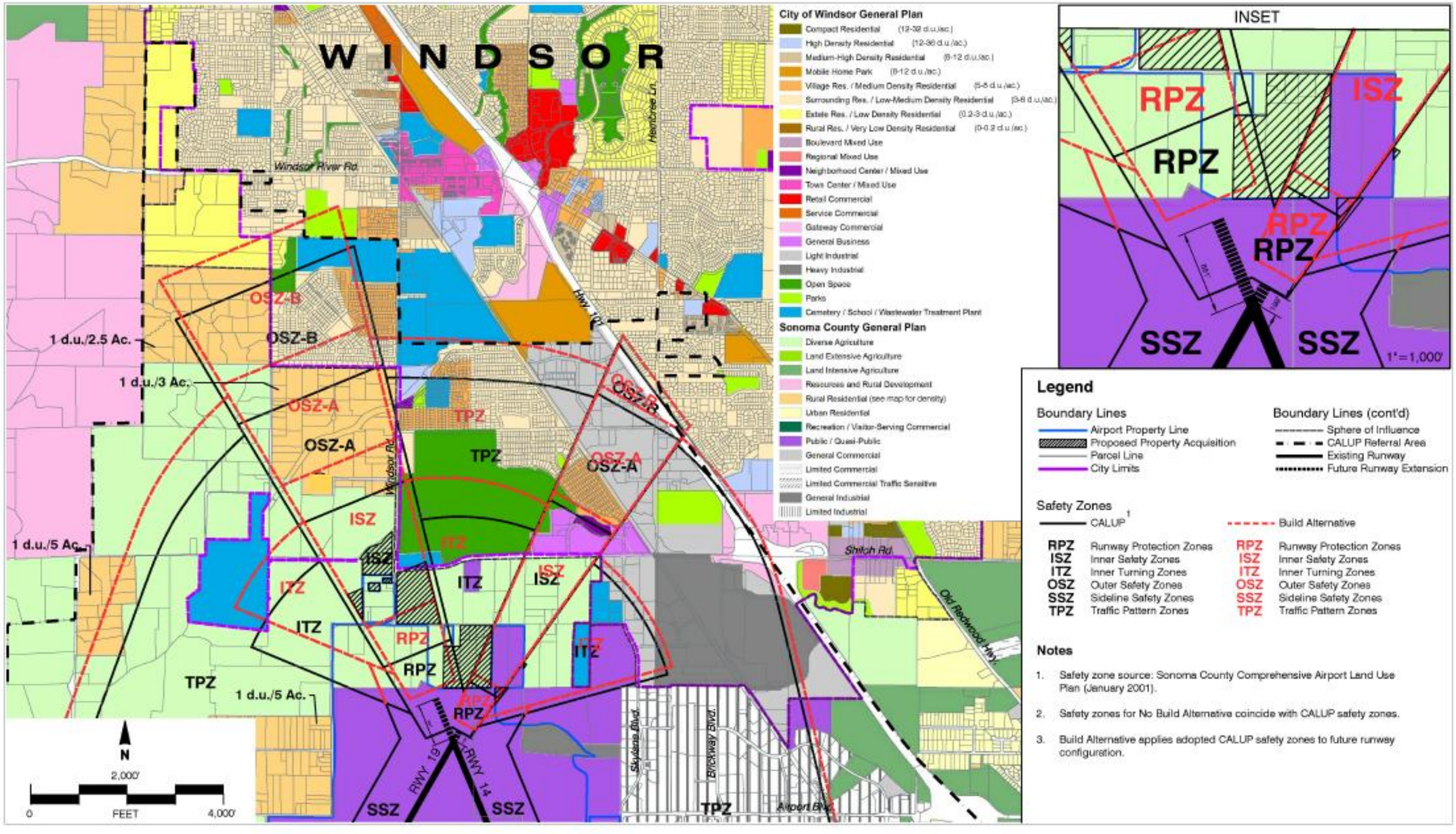

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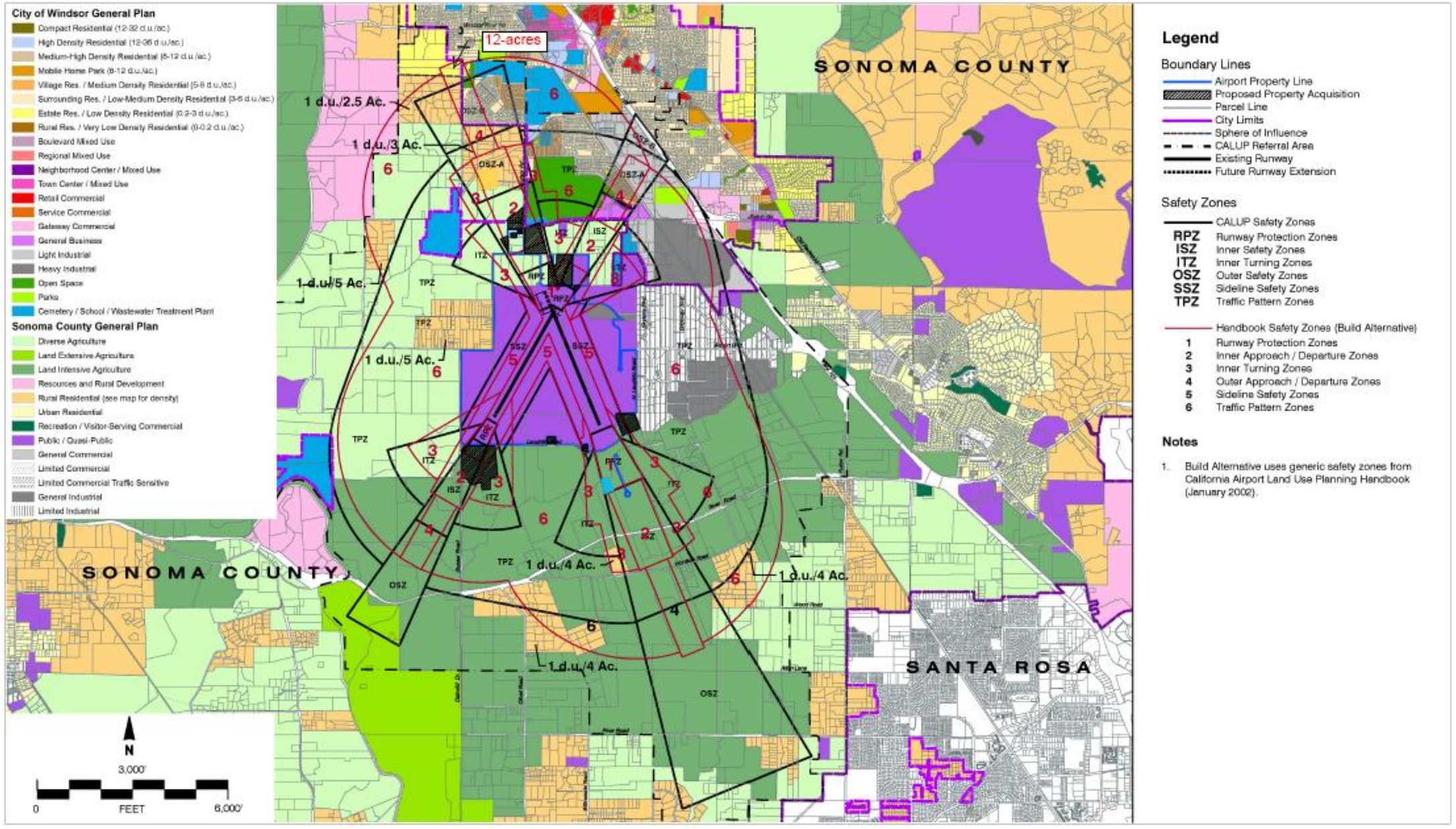
Figure A3-13-3



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COMMENT LETTER A4 – LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
Page 1 of 2

Sent By: CALTRANS TRANSPORTATIO PLANNING; 510 286 5560; Sep-19-11 9:18AM; Page 1/2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY EDMUND G. BROWN Jr., Governor

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September 19, 2011

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Mrs. Crystal Acker
County of Sonoma
Permit & Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403-2819

Dear Mrs. Acker:

Charles M. Schulz-Sonoma County Airport Master Plan Implementation Project – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the project referenced above. We have reviewed the documentation provided and have the following comments to offer.

Traffic Impact Analysis

1 As the volumes observed at the River Road/Laughlin Road/Woolsey Road intersection (Study Intersection #11) are from the US Highway (US) 101 Ramps at River Road/Markwest Springs Road, please analyze the US-101 Ramps at River Road/Markwest Springs Road for a more comprehensive understanding of traffic conditions.

2 Please add the following to Section 3.12.4.2 – Pedestrian and Bicycle Routes, under the Pedestrian header: "A sidewalk will be provided along the westbound direction of Airport Boulevard in the US-101/Airport Boulevard interchange reconstruction project."

3 Please provide a table of queue lengths of all study intersections to ensure that the left-turn and right-turn pockets are efficient.

4 Please provide the electronic SYNCHRO data files so we can review the cycle lengths, green times, and coordination of the signalized study intersections.

5 The Department acknowledges Mitigation Measure 3.12.9, in that "each new long-term project element with the potential to generate traffic is proposed, the County shall comply with Sonoma County Traffic Study Guidelines and, if required, prepare a project-level traffic study to assess the potential traffic impacts associated with that long-term project element." One of the Department's ongoing responsibilities is to collaborate with local agencies to avoid, eliminate, or reduce to insignificance potential adverse impacts of local development on the State's highways. Based on the project location, the Department anticipates adverse impacts on State transportation facilities, in this

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COMMENT LETTER A4 – LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
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Sent By: CALTRANS TRANSPORTATIO PLANNING; 510 286 5560; Sep-19-11 9:18AM; Page 2/2

Mrs. Crystal Acker/County of Sonoma
September 19, 2011
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case US-101, if and when an intensification of traffic-generating development occurs. Therefore, a traffic impact study (TIS) or a lesser level of analysis may be required to assess the impact of the project element on the adjacent road network, with specific attention to US-101. We recommend using the Department's *Guide for the Preparation of Traffic Impact Studies* (TIS Guide) for determining which scenarios and methodologies to use in the analysis. The guide is available at the following website address:

5

http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf. Please note that the TIS Guide is not official Department policy, but rather a starting point for collaboration between the lead agency and the Department "in determining when a TIS is needed. … The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic." (TIS Guide, page 2)

Please contact us to coordinate preparation of the scope of such traffic studies with our office. The Department appreciates early consultation; this allows us to implement our stewardship goal of protecting and enhancing the environment and quality of life in accordance with the environmental, economic, and social goals of California.

Should you have any questions regarding this letter, please call Connery Cepeda of my staff at (510) 286-5535.

Sincerely,

GARY ARNOLD
District Branch Chief
Local Development – Intergovernmental Review

c: Scott Morgan (State Clearinghouse)
Philip Crimmins (Division of Aeronautics)

"Caltrans improves mobility across California"

RESPONSES TO COMMENT LETTER A4 – LETTER SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION

Note: This comment letter was submitted individually by both the California Department of Transportation and the State Clearinghouse on behalf of the California Department of Transportation. For economy, it is only included once in this document.

A4-1 Contrary to the commenter's assertion, including the US Highway 101 Ramps at River Road/Mark West Springs Road does not add to a more comprehensive understanding of traffic conditions in the project study area. As shown throughout Section 3.12 of the Draft EIR, both the U.S.101/Airport Boulevard and U.S.101/Shiloh Road interchanges were included as intersections in the transportation and traffic analysis. Both of these interchanges are much closer to the Airport (and, thus, the project study area), than the River Road/Mark West Springs Road interchange with U.S. 101 advanced by the commenter. About two-thirds of all project traffic is projected to use Airport Boulevard for Airport access, with 15 to 17 percent using either River Road or Shiloh Road. Virtually all traffic accessing the Airport via the U.S.101 freeway would be expected to use the Airport Boulevard interchange. Most of the traffic using River Road to access the Airport would come from Fulton Road, as this route provides the most direct access to the west side of Santa Rosa.

Total two-way project traffic flow projected to be using River Road just east of Laughlin Road in 2015 would be 10 vehicles during the AM peak hour and 11 vehicles during the PM peak hour, while in 2030 two-way project traffic flow would be 34 vehicles during the AM peak hour and 39 vehicles during the PM peak hour. Assuming even half of this traffic would be traveling through the U.S.101/River Road-Mark West Springs Road interchange, its impact would be negligible during both horizon years. The U.S.101/River Road-Mark West Springs Road interchange was properly not included in the traffic analysis presented in the Draft EIR.

A4-2 This comment does not specifically address the analyses contained in the Draft EIR. Nevertheless, the Draft EIR will be revised to acknowledge the pedestrian improvements already being installed as part of the US 101/Airport Boulevard interchange reconstruction project. Page 3.12-10, Section 3.12.4.2, new sentence 3 is added as follows:

> "A sidewalk will be provided along the westbound direction of Airport Boulevard as part of the U.S. 101 / Airport Boulevard interchange reconstruction project."

A4-3 Vehicle queue lengths are included on the Synchro worksheets, which have been provided on disks to the California Department of Transportation (Caltrans). Summary tables of 95th percentile queue lengths[45] at the Caltrans interchanges evaluated in the Draft EIR (U.S.101/Shiloh Road and U.S.101/Airport Boulevard interchanges) are provided below (see **Tables A4-3-1** and **A4-3-2**). In addition, the Synchro files are

[45] The 95th-percentile queue is defined to be the queue length (in vehicles) that has only a 5-percent probability of being exceeded during the analysis time period. It is a useful parameter for determining the appropriate length of turn pockets.

available on the Airport's website and at the Permit and Resource Management Department (PRMD) offices to anyone who wants to review them.

A4-4 Disks with the Synchro data files were sent by U.S. mail to Connery Cepeda at Caltrans District 4 on 17 August 2011. In addition, the Synchro files are available on the Airport's website and at the Permit and Resource Management Department (PRMD) offices to anyone who wants to review them.

A4-5 As stated on page 3.12-27 of the Draft EIR, the County will comply with Sonoma County Traffic Study Guidelines and, if required, prepare a project-level traffic study to assess the potential traffic impacts associated with a long-term project element.

Table A4-3-1
95TH PERCENTILE VEHICLE QUEUES (IN FEET)
SCHULZ-SONOMA COUNTY AIRPORT MASTER PLAN UPDATE DEIR
AM PEAK HOUR

	YEAR 2015		YEAR 2030	
INTERSECTION	**WITHOUT PROPOSED PROJECT**	**WITH PROPOSED PROJECT**	**WITHOUT PROPOSED PROJECT**	**WITH PROPOSED PROJECT**
U.S.101/Airport Blvd. SB Ramps (Signal)[/a/]				
EB Thru	26	27	32	32
WB Thru	64	64	63	51
SB Left	31	31	40	41
SB Right	102	105	114	125
U.S.101/Airport Blvd. NB Ramps (Signal)[/a/]				
EB Left	106	98	139	143
EB Thru	22	24	22	32
WB Thru	173	174	274	292
NB Left	247	287	350	409
NB Right	19	19	33	31
U.S.101/Shiloh Road SB Ramps (Signal)				
EB Thru	88	81	104	109
WB Thru	260	271	262	262
SB Left	103	103	193	193
SB Right	73	77	135	177
U.S.101/Shiloh Road NB Ramps (Signal)				
EB Thru	61	58	76	78
WB Thru	279	302	483	489
NB Left	249	240	359	359
NB Right	19	18	21	21

/a/ Reconstructed U.S.101 interchange.

SOURCE: Synchro Software Program, 2011
PREPARED BY: Crane Transportation Group, 2011

Table A4-3-2
95TH PERCENTILE VEHICLE QUEUES (IN FEET)
SCHULZ-SONOMA COUNTY AIRPORT MASTER PLAN UPDATE DEIR

PM PEAK HOUR	YEAR 2015		YEAR 2030	
INTERSECTION	**WITHOUT PROPOSED PROJECT**	**WITH PROPOSED PROJECT**	**WITHOUT PROPOSED PROJECT**	**WITH PROPOSED PROJECT**
U.S.101/Airport Blvd. SB Ramps (Signal)[/a/]				
EB Thru	49	50	62	65
WB Thru	12	12	0	0
SB Left	43	43	48	48
SB Right	0	0	0	0
U.S.101/Airport Blvd. NB Ramps (Signal)[/a/]				
EB Left	86	87	175	180
EB Thru	36	39	41	46
WB Thru	60	63	114	120
NB Left	101	107	124	144
NB Right	33	32	69	78
U.S.101/Shiloh Road SB Ramps (Signal)				
EB Thru	171	174	200	216
WB Thru	246	246	344	353
SB Left	124	124	171	171
SB Right	38	38	49	51
U.S.101/Shiloh Road NB Ramps (Signal)				
EB Thru	91	91	109	107
WB Thru	217	217	337	338
NB Left	231	231	275	275
NB Right	82	62	84	85

/a/ Reconstructed U.S.101 interchange.

SOURCE: Synchro Software Program, 2011
PREPARED BY: Crane Transportation Group, 2011

COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION
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California Regional Water Quality Control Board
North Coast Region
Geoffrey M. Hales, Chairman
www.waterboards.ca.gov/northcoast
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Matt Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

September 19, 2011

Ms. Crystal Acker
Environmental Specialist
Sonoma County PRMD
2550 Ventura Avenue
Santa Rosa CA, 95403

Dear Ms. Acker:

Subject: Comments on the Charles M Schulz - Sonoma County Airport Master Plan Update Implementation Project, SCH No. 2008062022

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Charles M Schulz - Sonoma County Airport Master Plan Update Implementation Project (project). The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of those waters.

The project consists of an accumulation of several smaller projects related to maintaining and improving airport safety including maintaining and upgrading airport facilities over the next 20 years. Two runways on the project site will be extended. The first runway will be extended from 5,115 feet to 6,000 feet, and the second runway will be extended from 5,000 feet to 5,500 feet. The project will include the acquisition of 40 acres involving the demolition of buildings, filling of ponds and other surface waters, and construction of new terminal buildings. To meet FAA requirements for the new runways a 1,500 feet portion of Redwood Creek will be culverted.

We have the following comments on the project:

Impacts to Waters of the State

1 There are proposed impacts to waters of the state and other areas of potential impacts to water quality, including the loss of: vernal pools and seasonal wetlands, perennial

COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION
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and intermittent streams, ponds and marshes, and riparian areas; these losses total 11.9 acres. Within the total impact area, 0.5 acres are within creeks that equal the loss of approximately 1,500 linear feet of creek.

The DEIR describes permanent impacts to approximately 2,000 linear feet of creek and riparian habitat within Redwood, Airport, and Upper Ordinance Creeks. The DEIR proposes the loss of approximately 1,500 linear feet of creek channel, as well as additional riparian tree removal. Any loss of creek channel needs to be mitigated in-kind by linear foot and should be at a minimum mitigation ratio of 3:1. Mitigation for this loss (Mitigation Measure 3.4.10B) proposes 850 feet of trapezoidal replacement channel with "low statured shrub and/or herbaceous species that meet FAA guidelines for lands within and adjacent to a runway's Obstacle Free Area (OFA)." This proposal is approximately 600 linear feet short (at a 1:1 ratio, which is too low for mitigation), for a feature that will have less value than the original, does not account for temporal loss, does not account for habitat value loss, does not account for loss of animal migration/movement corridor, or for thermal gain (less shade). It is not appropriate mitigation, and the proposed ratio is too low. Rerouting options need to be further explored, and should propose a longer channel of better value to be recommended as mitigation. The proposal counts the linear channel impact as an area rather than by linear foot of impact; the impact will need to be assessed by length, both for impact and for mitigation. Alternatively, off-site in-kind mitigation, and/or purchase of applicable mitigation credits, may be acceptable as compensatory mitigation, if proposed at the appropriate mitigation ratio. Off-site mitigation projects may need to be at a ratio higher than 3:1 depending on the mitigation proposal.

1

Storm Water and Low Impact Development

The Regional Water Board requires the use of Low Impact Development (LID) and best management practices (BMPs) that treat and retain (infiltrate, capture, evapotranspirate and store) storm water runoff on the project site.

LID is a development site design strategy with a goal of maintaining or reproducing the pre-development hydrologic system through the use of design techniques to create a functionally equivalent hydrologic setting. LID emphasizes conservation and the use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely reflect pre-development hydrologic functions. Hydrologic functions of storage, infiltration, and ground water recharge, as well as the volume and frequency of discharges, are maintained through the use of integrated and distributed storm water retention and detention areas, reduction of impervious surfaces, and the lengthening of flow paths and runoff time. LID seeks to mimic the pre-development site hydrology through infiltration, interception, reuse, and evapotranspiration. LID requires that the storm water runoff volume from small storms be retained onsite.

2

COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION
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Other LID strategies include the preservation and protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable trees, flood plains, woodlands, native vegetation and permeable soils. Natural vegetation and soil filters storm water runoff and reduces the volume and pollutant loads of storm water runoff. Other benefits from LID implementation include reducing global warming impacts from new development (preserving carbon sequestering in native soils and retaining native vegetation), increasing water supply (by encouraging ground water recharge) and reducing energy consumption.

LID requires the use of landscape-based BMPs that filter storm water runoff using vegetation and amended soil prior to infiltration. Examples of these types of BMPs are rain gardens and vegetated swales. LID BMPs need to be sized to treat the storm water runoff from all impervious surfaces (e.g. roads, roofs, walkways, patios) using the following sizing criteria:

2

1. The volume of runoff produced from the 85th percentile of 24-hour rainfall event, as determined from the local historical rainfall record; or

2. The volume of runoff produced by the 85th percentile 24-hour rainfall event, determined using the maximized capture storm water volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, p. 170-178 (1998); or

3. The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Storm Water Best Management Practices Handbook-Industrial/Commercial (1993).

BMPs to prevent erosion and the release of sediment or hazardous materials during construction activities should be included in the subsequent environmental review documents to prevent sediment and other pollutants reaching surface waters or leaving the site in storm water runoff. These can include scheduling grading to take place during the dry season, identifying staging areas for work vehicles that are separated from sensitive areas, training employees in procedures for cleaning up spills of hazardous materials, and erosion and sediment control techniques.

Spill Response and Cleanup

3

The project must include updated BMPs and spill response and cleanup procedures for the storage and use of chemicals and hazardous materials on site during the project and after, during normal airport activities. These BMPs need to address non-storm water discharges (spills) and discharges that mix with storm water (as from rain during paving operations). These discharges need to be contained and prevented from reaching the ground, groundwaters, and surface waters. And the BMPs and procedures

COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION
Page 4 of 5

3 should be included in the updated Storm Water Pollution Prevention Plan required by the Industrial General Storm Water Permit.

Airport-wide Best Management Practices

4 The Airport facilities have a large area of impervious surface, many on-site wetlands, streams, and pools, significant pollutant sources, and a large industrial/municipal operation. All of these factors contribute to a high risk to water quality from activities conducted at the Airport. The project should include an evaluation and retrofit of the Airport-wide BMPs (activities and structures) to protect water quality. The Regional Water Board is available to discuss these BMPs with Airport staff and may address this issue in upcoming 401 Water Quality Certifications or in the updated Storm Water Pollution Prevention Plan required by the Industrial General Storm Water Permit.

The following summarizes project permits that may be required by our agency:

Construction General Storm Water Permit:

5 Land disturbances on projects of one acre or more require coverage under the construction general storm water permit. If the land disturbance will be one acre or more, the owner of the property will need to apply for coverage under this permit prior to the commencement of activities on-site. This permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies BMPs to implement and maintain to minimize pollutant discharges from a construction site. The permit also requires a risk level analysis for the project based on erosion risk and sensitivity of the receiving waters, inspections of construction sites before and after storm events, and every 24 hours during extended storm events, storm event monitoring, and electronic document and data submittal. The permit requires the use of Low Impact Development to treat post-construction storm water runoff from impervious surfaces. Owners may find the permit at http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml.

Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs:

6 Under authority of the California Water Code, the Regional Water Board may issue WDRs for any project which discharges or threatens to discharge waste to waters of the state. Projects that impact waters of the state (including discharges of post-construction storm water runoff, grading activities within stream courses or wetlands, and removal of riparian vegetation in some cases) require permitting by the Regional Water Board. The Regional Water Board may also require permits for on-site septic systems accepting 1,500 gallons or more per day. An application may be printed from the State Water Resource Control Board website at: www.swrcb.ca.gov/sbforms/.

Water Quality Certification (401 Certification):

7 Permit issued for activities resulting in dredge or fill within waters of the United States. All projects must be evaluated for the presence of jurisdictional wetlands and other

COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION
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7 waters of the state. Destruction of or impacts to these waters should be avoided. Under the Clean Water Act Sections 401 and 404, disturbing wetlands requires a permit from the United States Army Corps of Engineers (ACOE) and a state 401 permit. To determine whether wetlands may be present on any proposed construction site, please contact Jane Hicks of ACOE at (415) 503-6771. If wetlands are present, please contact Mark Neely from our office at (707) 576-2689 for a 401 Permit or other permit action.

If you have any questions or comments, please contact me at (707) 570-3761 or mdougherty@waterboards.ca.gov .

Sincerely,

Mona Dougherty
Water Resource Control Engineer

cc: Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812
Re: SCH No. 2008062022

RESPONSES TO COMMENT LETTER A5 – LETTER SUBMITTED BY THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – NORTH COAST REGION

Note: This comment letter was submitted individually by both the California Regional Water Quality Control Board – North Coast Region and the State Clearinghouse on behalf of the California Regional Water Quality Control Board – North Coast Region. For economy, it is only included once in this document.

A5-1 The commenter's summary of the proposed stream and riparian impacts and mitigation elements is not correct. For a discussion of the appropriate mitigation ratios and replacement of creek/riparian habitat functional values, please see the response to comment #A2-9 of the letter submitted by the California Department of Fish and Game (Comment Letter A2) on page 5-6.

It is important to note that FAA guidelines restrict the options associated with re-routing creeks near the approach end of a runway. For a discussion of other creek re-routing options, please see the response to comment #A2-11 of the letter submitted by the California Department of Fish and Game (Comment Letter A2) on page 5-6.

With regard to linear feet of mitigation, it is important to note that all of the 4.9 acres of riparian woodland and willow scrub mitigation habitat to be established under Mitigation Measures 3.4.10B, 3.4.10D and 3.4.11 on pages 3.4-47 through 3.4-49 of the Draft EIR would be conducted along other stream channels. The total linear feet of restored habitat under these measures, combined with the total linear feet of re-routed Airport Creek channel, would result in a mitigation ratio that would significantly exceed 1:1. However, it is important to note that all the mitigation measures relating to creek and riparian impacts state that the final mitigation plan (including the amount an types of mitigation) will be subject to the review and approval of the Regional Water Quality Control Board (RWQCB) and other regulatory agencies.

A5-2 The Draft EIR fully acknowledges and incorporates the RWQCB requirement for low impact design (LID) and best management practices (BMPs) that treat and retain stormwater runoff. These measures are included and discussed in the analysis of Impact 3.8.1 on pages 3.8-7 through 3.8-9 of the Draft EIR, which describes the retention facility proposed as required by the *Guidelines for Standard Urban Storm Water Mitigation*[46]. The discussion of Impact 3.8.4 on pages 3.8-12 and 3.8-13 of the Draft EIR describes proposed passive treatment methods (LID) to treat stormwater runoff. BMPs to reduce construction-related impacts are discussed as part of Impact 3.8.3 on pages 3.8-11 and 3.8-12 of the Draft EIR.

A5-3 The Draft EIR fully acknowledges and incorporates the requirement to include updated BMPs and spill response and cleanup procedures for the storage and use of chemicals and hazardous materials. As stated on pages 3.7-6 and 3.7-7 of the Draft EIR, the Airport would continue to implement Best Management Practices (BMPs) for the handling of hazardous materials and would continue to use practices outlined in the Public Safety Element of the Sonoma County General Plan 2020. These measures are

[46] Sonoma County, *Guidelines for the Standard Urban Storm Water Mitigation Plan* (2005), available at: http://www.sonoma-county.org/prmd/sw/pdf/susmp.pdf.

periodically reviewed and updated as necessary to fully meet applicable federal, state and local guidelines.

A5-4 The Airport has been operated by the County for more than 60 years and the County is fully aware of the responsibilities with respect to water runoff and water quality issues. As stated on page 3.8-13 of the Draft EIR, the proposed changes in impervious surfaces at the Airport would be reflected in the update to the Airport's Storm Water Pollution Prevention Plan (SWPPP) and maintenance and sampling protocols will be revised to include such improvements.

A5-5 The County is aware of and has fully acknowledged its obligation to obtain a construction general storm water permit and to prepare and implement a Storm Water Pollution Prevention Plan that identifies and implements BMPs to maintains and minimizes pollutant discharges from construction. As stated on page 3.8-12 of the Draft EIR, the County would be required to file a Notice of Intent with the State Water Resources Control Board in compliance with General Construction Permit and to prepare and implement a SWPPP and an erosion control plan. The County will work with the Regional Water Quality Control Board to identify the BMPs to be included in the General Construction Permit.

A5-6 As stated on page 3.8-13 of the Draft EIR, the County has acknowledged that a permit would be required from the Regional Water Quality Control Board. The County acknowledges that Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs may be required as part of the permit process.

A5-7 As stated on page 2.21 of the Draft EIR, the County has indicated that a Section 401 Permit from the Regional Water Quality Control Board would be required.

COMMENT LETTER A6 – LETTER SUBMITTED BY THE SONOMA COUNTY WATER AGENCY
Page 1 of 1

SONOMA COUNTY WATER AGENCY

MEMORANDUM

Date: September 19, 2011

To: Crystal Acker, Permit and Resource Management Department

From: Connie Barton CB

SUBJECT: Charles M. Schulz Sonoma County Airport Master Plan Implementation Project

The Sonoma County Water Agency (Water Agency) has reviewed the Draft Environmental Impact Report (DEIR) for the above-mentioned project and submits the following comments.

1 Page 3.8-8 of Chapter 3.8, Section 3.8.2.3 Groundwater, last paragraph: Please note that based on direction received in January 2000 from its Board of Directors, the Water Agency has developed and implemented a program (Groundwater Basin Assessment and Management Program) intended to enhance the current knowledge of groundwater resources within Sonoma County. The approach for the program is to conduct a scientific basin-wide study of the four largest and most heavily populated groundwater basins in Sonoma County (Alexander Valley, Petaluma Valley, Santa Rosa Plain and Sonoma Valley) to provide a basis for subsequent groundwater management planning activities which emphasize local and regional coordination and collaboration (if basin stakeholders and the Water Agency's Board support development of a management planning process). The Sonoma Valley and Alexander Valley groundwater studies were completed in 2006 (USGS, 2006a and b). The USGS technical study for the Santa Rosa Plain commenced in 2006 and is scheduled to be completed in 2011.

2 Page 3.8-10 of Chapter 3.8, Impact 3.8.2: The Water Agency is concerned with any activity that may affect the operation and maintenance of our facilities located at Airport-Larkfield-Wikiup Sanitation facility. The Water Agency requests the opportunity to review design plans for the re-routing of Airport Creek and Ordinance Creek when they become available.

3 Page 3.8-14 of Chapter 3.8, Impact 3.8.6: The Water Agency requests the opportunity to review environmental documents and civil design plans for the long-term future project elements when they become available.

Thank you for the opportunity to comment. For flood and drainage questions please contact Phil Wadsworth at 547-1945. For groundwater questions please contact Kevin Booker at 547-1823. For questions regarding Agency comments, please contact Connie Barton at 547-1905 or connie.barton@scwa.ca.gov.

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RESPONSES TO COMMENT LETTER A6 – LETTER SUBMITTED BY SONOMA COUNTY WATER AGENCY

A6-1 The County acknowledges that the Sonoma County Water Agency has developed and implemented a program intended to enhance the knowledge of groundwater resources within Sonoma County and that the study focusing on the Santa Rosa Plain, of which the Airport is a part, will be finished in 2011.

A6-2 If the County of Sonoma approves the Proposed Project, the County will provide the design plans for the realignment of Airport Creek and Ordinance Creek to the Sonoma County Water Agency for review.

A6-3 As a land owner in the Airport vicinity, the Sonoma County Water Agency will receive all notifications of future projects at the Airport and be given opportunity to review and comment on any future environmental review documentation.

COMMENT LETTER A7 – REPORT SUBMITTED BY SONOMA COUNTY AIRPORT LAND USE COMMISSION
Page 1 of 3

Resolution Number 11-02

Sonoma County Airport Land Use Commission
Santa Rosa, California

September 19, 2011

RESOLUTION OF THE SONOMA COUNTY AIRPORT LAND USE COMMISSION DETERMINING THAT THE PROPOSED MASTER PLAN UPDATE FOR THE CHARLES M SCHULZ - SONOMA COUNTY AIRPORT IS NOT CONSISTENT WITH THE CURRENT COMPREHENSIVE AIRPORT LAND USE PLAN FOR SONOMA COUNTY AND INITIATING THE PROCESS OF AMENDING THE COMPREHENSIVE AIRPORT LAND USE PLAN TO REFLECT THE PROPOSED AIRPORT MASTER PLAN.

WHEREAS, a draft "Charles M. Schulz – Sonoma County Airport Master Plan" ("Master Plan") has been prepared and provided to the Sonoma County Airport Land Use Commission ("Commission"); and

WHEREAS, a Draft Environmental Impact Report ("DEIR") for the Master Plan Update Implementation Project has been prepared and provided to the Commission; and

WHEREAS, the Comprehensive Airport Land Use Plan for Sonoma County ("CALUP"), adopted by the Commission in 2001, requires local agencies to refer the proposed adoption or modification of the master plan for a public-use airport to the Commission for a determination of consistency with the CALUP prior to the approval of the master plan; and

WHEREAS, the Commission considered the proposed Master Plan at a public meeting on September 19, 2011 in accordance with the appropriate law and guidelines; and

WHEREAS, the CALUP provides that the Commission, when reviewing airport master plans for existing airports, has the following action choices:

1. Find the airport master plan consistent with the CALUP.

2. Disapprove the airport master plan on the basis that it is inconsistent with the CALUP.

3. Modify the CALUP after a duly-noticed public hearing to reflect the assumptions and proposals in the airport master plan.

WHEREAS, the CALUP provides that the Commission, in finding whether the proposed airport master plan is consistent with the CALUP, shall determine whether the activity forecasts or proposed facility development identified in the proposed master plan differ substantially from the forecasts and development assumed for that airport in the CALUP and would result in greater noise, overflight, and safety impacts or height restrictions on surrounding land uses than are presently assumed in the CALUP. In making that determination, the CALUP further states that the Commission should focus on:

1. Activity forecasts that are: (1) significantly higher than those in the CALUP; or which (2) include a significantly higher proportion of larger or noisier aircraft.

COMMENT LETTER A7 – REPORT SUBMITTED BY SONOMA COUNTY AIRPORT LAND USE COMMISSION
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ALUC Resolution 11-02
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2. Proposals to: (1) construct a new runway or helicopter takeoff and landing area; (2) change the length, width, or landing threshold location of an existing runway; or (3) establish an instrument approach procedure.

NOW, THEREFORE IT BE RESOLVED that the Commission determines that the proposed Master Plan is not consistent with the current CALUP, based on the following specific findings:

1. The location and arrangement of the referral area, noise contours, safety zones, airspace surfaces and other provisions of the current CALUP are based on the runway configuration and projected activity levels contained in the current Master Plan adopted in 1991.

2. The proposed Master Plan includes an 885-foot northerly extension of Runway 14/32 and a 200-foot northerly extension of Runway 1/19, changes that could result in greater noise, overflight, and safety impacts or height restrictions on surrounding land uses than are presently assumed in the CALUP.

3. The proposed Master Plan would necessitate modifying the CALUP safety zones and airspace surfaces to reflect the proposed northerly extensions of the runways.

BE IT FURTHER RESOLVED that the Commission directs staff to pass the specific comments attached to this resolution on the Master Plan DEIR to the County Planning Commission, and bring back a proposal to amend the CALUP to reflect to reflect the assumptions and proposals in the proposed Master Plan.

BE IT FURTHER RESOLVED that all applicable jurisdictions that may be subject to changes in the CALUP from this project be fully notified of the DEIR and potential future ALUC actions.

BE IT FURTHER RESOLVED that costs involved to amend the CALUP will need to be reimbursed by the appropriate entity.

BE IT FURTHER RESOLVED that the Commission designates staff of the Sonoma County Permit and Resource Management Department as the custodian of the documents and material which constitutes the record of proceedings upon which the decision herein is based. These documents and materials may be found at the office of the Department at 2550 Ventura Avenue, Santa Rosa, California 95403.

THE FOREGOING RESOLUTION was introduced by Commissioner Smith, who moved its adoption, seconded by Commissioner Sawyer, and adopted on roll call by the following vote:

Commissioner Salmon	Aye
Commissioner Smith	Aye
Commissioner Sawyer	Aye
Commissioner Johnston	Aye
Commissioner Cochran	Aye
Commissioner Kaplan	Absent

Ayes: 5 Noes: 0 Absent: 1 Abstain:

WHEREUPON, the Chair declared the above and foregoing resolution duly adopted; and

SO ORDERED.

COMMENT LETTER A7 – REPORT SUBMITTED BY SONOMA COUNTY AIRPORT LAND USE COMMISSION
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ALUC Comments on Sonoma County Airport Master Plan DEIR
September 19, 2011

The DEIR for the Sonoma County Airport Master Plan project should consider the need to amend the CALUP to reflect the Master Plan proposals, permit the use of the assessment in the Airport Land Use Commission's consideration of the related CALUP amendment, and note the below specific comments:

1	Pages 3.9-1 & 2: The brief references to the CALUP appear to be accurate.
2	Pages 3.9-3 & 4: The lengthy review of Commission authority is accurate.
3	Pages 3.9-4 & 5: The description of the CALUP and its content are both quite adequate.
4	Page 3.9-6 - First paragraph of Impact 3.9.1 discussion: Delete the second sentence, "None of these categories . . . .", because it is not consistent with the subsequent analyses of runway configuration, safety zones and airspace surfaces that indicate that CALUP changes are needed.
5	Page 3.9-7 - Second paragraph of "Safety Zones": The text describes revised CALUP safety zones based on analysis of the 2002 Handbook, but the referenced Figure 3.9-4 graphically describing these zones does not appear to be in either the printed or web copies of the DEIR nor in any of the Appendices. This Figure is essential to public review and the Commission's consideration of a CALUP amendment and should be provided as stated in the text. This Figure should show the revised safety zones all around the Airport, not just around the north runway extensions, because the safety zones should be changed as needed by the Handbook around both ends of both runways.
6	Page 3.9-7 - Last paragraph of "Safety Zones": Here the EIR presents two general options for the Airport Land Use Commission in changing the CALUP safety zones. While it is technically true that the Commission has the power to choose the first option to simply relocate the current CALUP safety zones to match the proposed changes in runway ends and touchdown points, this option does not reflect the State law requirement that the latest Handbook be considered in CALUP amendments and the substantial differences in the shapes and sizes of safety zones suggested in the current Handbook compared to the previous Handbook. These facts mandate strong consideration of the second option to develop new or revised safety zones based on the current Handbook. This information should be provided with the safety zone options to provide a more complete understanding of the process required.
7	Page 3.9-8 - The long list of CALUP sections that need to be revised to reflect Master Plan proposals appears to be accurate. However, the last bulleted statement, "If the ALUC does not amend . . . ." is out of place here and should be moved to the discussion on the next page of implications on local general plans.
8	Page 3.9-9 to 12: The detailed parcel-level analysis of the implications of revising CALUP noise contours and safety zones appears to be accurate.