SECTION B
ORGANIZATIONS COMMENTING ON THE DRAFT EIR

COMMENT LETTER B1 – LETTER SUBMITTED BY TOMARAS & OGAS, LLP
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TOMARAS & OGAS, LLP

10755-F Scripps Poway Parkway #281 • San Diego, California 92131
Telephone (858) 554-0550 • Facsimile (858) 777-5765 • www.mtowlaw.com

Kathryn A. Ogas kogas@mtowlaw.com
Brenda L. Tomaras btomaras@mtowlaw.com

September 6, 2011

Via E-mail

Crystal Acker
Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Comments on Draft Environmental Impact Report for the Airport Master Plan Implementation Project

Dear Ms. Acker:

This comment letter is submitted on behalf of the Lytton Rancheria of California (hereinafter, "Lytton Tribe"), a federally recognized Indian tribe and sovereign government. The Lytton Tribe submits the following comments on the Draft Environmental Impact Report (DEIR) for the Airport Master Plan Implementation Project. We request that these comments, as well as any subsequent comments submitted by the Lytton Tribe, be included in the record for approval of the Project.

REQUESTED NOTICE AND INVOLVEMENT

The Lytton Tribe formally requests, pursuant to Public Resources Code §21092.2, to continue to be notified and involved in the entire environmental review process under CEQA during the mining Projects contemplated under this document. This includes adding the Tribe to the distribution list(s) for public notices and public circulation of all documents pertaining to the Project. The Tribe further requests to continue to be directly notified of all public hearings and scheduled approvals concerning the Project.

THE LEAD AGENCY MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE TRIBE IN ITS REVIEW PROCESS

It has been the intent of the Federal Government[1] and the State of California[2] that Indian

[1] See Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments and Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments.

[2] See California Public Resource Code §5097.9 et seq. and Cal. Govt. Code §§ 65351, 65352, 65352.3 and 65352.4.

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tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments such as approval of Specific Plans and EIRs. In this case, it is undisputed that portions of the project lie within Lytton Tribe's traditional territory and the Tribe appreciates Sonoma County's willingness to consult with the Tribe on this Project, as well as to keep the Tribe informed of the progress of this Project.

LYTTON TRIBAL CULTURAL AFFILIATION TO THE PROJECT AREA AND PROJECT IMPACTS TO CULTURAL RESOURCES

1 The Lytton Band is not opposed to this project. The Tribe's primary concerns stem from the project's likely impacts on Native American cultural resources. The Lytton Band has a legal and cultural interest in the proper protection of sacred places and all Pomo cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Pomo village sites and archaeological items which would be displaced by development, and with the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the mining project given the proximity to stream areas.

The Pomo people, and the Lytton Rancheria in particular, traditionally occupied the geographical area known today as the County of Sonoma for thousands of years, including the area of Alexander Valley and within the Town of Windsor. This is verified through stories and songs of the Pomo people that are cultural evidence of the Tribe's cultural affiliation with these lands. Occupation is also evidenced through the location of the Tribe's prior reservation, anthropological studies, archaeological studies, and histories of the area. In addition, Tribal ties to these territories have been maintained to the present day through cultural and governmental actions.

2 Three cultural sites were identified within the Study Area, with one additional site identified during the field survey. The Tribe is particularly concerned with Site CA-SON-1322 and the new site due to their location on the banks of the Creek. As the County is aware, creek beds can be highly sensitive areas and may potentially contain burials. As such, the Tribe requests that the utmost care be taken to avoid the creek bed and banks where possible. Given that Native American cultural resources may be affected by the Project, there should be adequate consultation with the Tribe in assessing the potential impacts and developing adequate mitigation for such impacts.

3 Finally, the Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the Project must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains.

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DRAFT EIR AND MITIGATION MEASURES

Environmental Impact Reports must provide adequate protection for significant archaeological and cultural sites and adequately follow the provisions of CEQA and its Guidelines, including Calif. Pub. Res. Code § 21083.2(b) (avoidance as preferred method of preservation of archaeological resources), CEQA Guidelines § 15126.4(b)(3) (agencies should avoid effects on historical resources of archaeological nature), and CEQA Guidelines § 15020 (lead agency responsible for adequacy of environmental documents).

The Tribe requests the following revisions be made to the proposed mitigation measures in order to more closely comport with applicable law and the cooperative relationship between the County and the Tribe:

Mitigation Measure 3.5.1

4

An archaeologist who meets the Secretary of the Interior's *Professional Qualifications Standards for Archeology* (36 CFR Part 61) shall be on-site during earth moving activities within 50 feet of the recorded boundaries of the two identified archaeological cultural resources with the assigned responsibility to monitor construction activities. If earth-moving activities uncover artifacts, or unusual amounts of non-human bone, work shall be halted within 25 feet of the find and shall not be resumed until after the trained individual has inspected and evaluated the deposit and determined in consultation with the appropriate tribe(s) the appropriate means of action. If avoidance is not feasible, the archaeological cultural resources shall be evaluated in consultation with the appropriate tribe(s) for their eligibility for listing in the California Register, and whether they qualify as "unique archaeological resources" under CEQA. The County shall:

contact a qualified archaeologist to assess the situation;
consult with descendant communities and interested parties (as appropriate); and
develop and implement an approach for the treatment of the discovery.

The assessment of the find's significance, the potential that it will be affected, and potential treatment approaches shall be accomplished through discussions and exchanges of information with appropriate tribal jurisdictions (if the find is prehistoric in nature). Project personnel should not collect or move any archaeological materials.

Upon completion of the assessment and (if warranted) treatment, the archaeologist shall prepare a report documenting the methods and results, and provide recommendations for additional study, as necessary. The report shall be submitted to the County, ~~and~~ the Northwest Information Center (NWIC), and the interested appropriate tribe(s).

Mitigation Measure 3.5.2

5

If human remains are discovered during project activities, work within 25 feet of the discovery shall be redirected and the Sonoma County Coroner notified immediately. At the same time, an archaeologist, if not present, should be contacted to assess the situation and consult with the tribal communities and the Coroner. Project personnel should not collect or move any human

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5

remains and associated materials, and no project activity shall occur in the 25-foot exclusion area around the discovery until the Coroner has finished his/her analysis.

If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. The MLD shall then engage in consultation concerning the treatment of the remains pursuant to Public Resources Code Section 5097.98. All documents concerning the ultimate treatment and disposition of the remains will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r).

~~Upon completion of the assessment, the archaeologist shall prepare a report documenting the methods and results, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the County and the NWIC.~~

The Lytton Tribe looks forward to working together with Sonoma County and other interested agencies in protecting any invaluable Pomo cultural resources found in the Project area. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

TOMARAS & OGAS, LLP

Brenda L. Tomaras
Attorneys for the Lytton Rancheria of California

RESPONSES TO COMMENT LETTER B1 – LETTER SUBMITTED BY TOMARAS & OGAS, LLP

B1-1 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment regarding the importance of these lands to the Lytton Tribe 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.

B1-2 The archaeological resources within the Airport Study Area are discussed in Section 3.5.2.4 on pages 3.5-6 and 3.5-7 of the Draft EIR. This comment regarding the importance of these resources and the consultation desired by the Lytton Tribe is acknowledged.

B1-3 The County acknowledges the application of Public Resources Code § 5097.98 to the discovery of Native American Remains. Mitigation Measure 3.5.2B on page 3.5-11 of the Draft EIR addresses the discovery of human remains. For revisions to Mitigation Measure 3.5.2B, please see the response to comment #B1-5 of the letter submitted by Tomaras & Ogas (Comment Letter B1), below.

B1-4 Paragraph 1 of Mitigation Measure 3.5.1 on page 3.5-10 of the Draft EIR is amended by revising sentences 2 and 3 to read as follows:

> If earth-moving activities uncover artifacts, or unusual amount of non-human bone, work shall be halted within 25 feet of the find and shall not be resumed until after the trained individual has inspected and evaluated the deposit and determined in consultation with the appropriate tribes(s) the appropriate means of action. If avoidance is not feasible, the archaeological cultural resources shall be evaluated in consultation with the appropriate tribes(s) for their eligibility for listing in the California Register, and whether they quality as "unique archaeological resources" under CEQA.

Mitigation Measure 3.5.1 on page 3.5.10 of the Draft EIR is further amended by revising sentence 2 of paragraph 3 to read as follows:

> The report shall be submitted to the County, ~~and~~ the Northwest Information Center (NWIC), and the interested appropriate tribes(s).

B1-5 Mitigation Measure 3.5.2 on page 3.65.11 of the Draft EIR is revised by adding new sentences 3, 4, and 5 to Paragraph 3 to read as follows:

> The MLD shall then engage in consultation concerning the treatment of the remains pursuant to Public Resources Code Section 5097.98. All documents concerning the ultimate treatment and disposition of the remains will not be governed by public disclosure requirements of the California Public Records Act, California Government Code 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r).

Page 3.5-11, paragraph 4 of the Draft EIR is deleted in its entirety:

~~Upon completion of the assessment, the archaeologist shall prepare a report documenting the methods and result, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the County and the NWIC.~~

COMMENT LETTER B2 – LETTER SUBMITTED BY HEALDSBURG CITIZENS FOR SUSTAINABLE SOLUTIONS



Healdsburg Citizens
for
Sustainable Solutions



September 12, 2011

RECEIVED
SEP 15 2011
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT COUNTY OF SONOMA

Sonoma County Planning Commission
575 Administration Dr. Rm. 104A
Santa Rosa, CA.

RE: Airport expansion

Dear Commissioners,

Please add HCSS to the growing list of **opponents** to the oversized expansion of the county airport.. As reported in the Press Democrat, several airlines have "dictated" that our local airport must accept full sized aircraft, expand the runways to regional size, expose north county to excess noise and accident dangers, uproot longtime residents, and forever change the quality of life here. For what?

1

It is unfortunate that the current economy is used as an excuse to expand county infrastructure into agricultural/rural regions. Those who will profit themselves, as always, are leading the charge.

We should not take irreversible steps to over-develop Sonoma County, or to move away from an agricultural based economy, or to undermine voter approved Urban Growth Boundaries and the county Ag and open Space District .

The press releases make this expansion appear to be decided with no smaller project alternatives offered! Our supporters report that their experience is excellent with the Horizon mid-sized 75 passenger Q-400 aircraft. Other airlines should follow their example if they want to compete in Sonoma County.

We will oppose larger aircraft and longer runways.

Warren Watkins
HCSS supporter

PO Box 1754 ~ Healdsburg CA 95448 ~ owlwo@sonic.net

RESPONSES TO COMMENT LETTER B2 – LETTER SUBMITTED BY HEALDSBURG CITIZENS FOR SUSTAINABLE SOLUTIONS

B2-1 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment in opposition 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.

COMMENT LETTER B3 – LETTER SUBMITTED BY SONOMA COUNTY WATER COALITION
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Sonoma County Water Coalition
55A Ridgway Avenue, Santa Rosa, CA 95401 SCWaterCoalition@aol.com
707-494-5769

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

Email: crystal.acker@sonoma-county.org Sept 15, 2011

Subject: Sonoma County Water Coalition (SCWC) comments on the Sonoma County Airport Master Plan Implementation Project DEIR.

Dear Ms Acker,

The Sonoma County Water Coalition (SCWC) includes 32 organizations representing more than 24,000 concerned citizens. SCWC works for the preservation of healthy ecosystems and all public trust resources, especially for careful oversight of surface and groundwater quality and quantity, and watershed restoration and protection. We are very concerned about the diminishing extent of wetland ecosystems, which provide a safe, economical and reliable water supply for all living things, including the people of Sonoma County.

Wetlands and wetlands habitats provide numerous ecological services, especially of flood reduction, oxygen production, carbon sequestration and water purification, which human and other animal populations need for survival. Since the proposed project's impacts will be borne by Airport and Windsor area residents, mitigation for habitat loss should be focused in the same areas. The ecological, biotic and open space "benefits" accruing from preserve acquisition and mitigation should be directed to areas around the Airport and Windsor.

1 SCWC disagrees with the Less-Than-Significant (LTS) assessments of impacts on habitat from either or both Short-term and Long-term project elements for the following species[1]:

- Burke's Goldfields(S)
- Sonoma Sunshine(S)
- Burrowing Owls
- Western Pond Turtle
- Sebastopol Meadowfoam(S)
- Papoose Tarplant(S)
- Nesting Birds
- American Badgers
- California Tiger Salamander(S)
- Oak Woodlands
- Roosting Bats

2 The DEIR's assessment of LTS impact for the Airport expansion violates Sonoma County's General Plan Policy OSRC-7b, which requires site assessment **and adequate mitigation with the top priority of avoiding loss of biotic resources, and on-site mitigation to achieve "no net loss" as a secondary priority**. The LTS assessment also conflicts with Approved Conservation Plans for both Short-term and Long-term project elements.

3 The court ruling *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) stated that "CEQA requires an agency to take steps to ensure that mitigation measures "will actually be implemented as a condition of development, and not merely adopted and then neglected or discarded." The Airport's wetland preserves were established mainly to mitigate Airport on site wetland impacts, while the 2 SACMA preserves supposedly mitigate off site wetlands impacts from other County projects.

[1] Special status species, listed either as threatened or endangered, indicated by (S)

COMMENT LETTER B3 – LETTER SUBMITTED BY SONOMA COUNTY WATER COALITION
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3 After years of failing to adequately manage those preserves to avoid even net loss, this Master Plan further threatens wetland species in closely adjacent areas, extending the cumulative impacts. This history of degradation is of particular concern due to the declining wetlands acreage and special status species occurrences within and adjacent to the Airport.

4 The SCWC also is concerned about the segmentation of the Airport Master Plan project implementation into short-term and long-term projects. Too often, project segmentation leads to habitat fragmentation, a leading cause of habitat destruction. We contend that the set of short and long-term projects described in this DEIR is a piece-meal approach that makes the Master Plan a continuation of the original airport development. This opens the proposed projects to application of policy requirements for impact mitigations under the 2005 General Plan revision (OSRC-7b op. cit.).

5 We do not agree that impacts and mitigation for long term projects cannot be identified and discussed. The EIR process provides the most time and resources for identifying project impacts, providing the public an opportunity to express concerns, and demonstrating the commitment of elected and appointed officials to environmental protection.

SCWC's suggestions for meeting our concerns are discussed in the following sections:

6 **I. Reserves previously established for mitigating impacts to wetlands within the original air port footprint have been allowed to degrade.**

The Airport's record is one of allowing practices that degrade wetland and oak woodland habitats containing many species of limited distribution. For example, the DEIR states "past Airport development and operational activities or other unknown causes" led to the extirpation of historic Burke's Goldfields subpopulations at the Airport, but it does not propose any steps to change or remediate the incompatible management actions that have either caused or led to progressive habitat degradation and species loss within the airport footprint. In addition, the historic Sebastopol Meadowfoam population at the Goldfields Preserve is believed extirpated because "adjacent irrigation may have altered the hydrology sufficiently to convert the swale into a persistent wetland" (CNDDB).

In the DEIR, designated wetland preserves are treated as physical features of the Airport, rather than as dynamic, functioning habitat. For example, Project element 1S4 abuts the northern and southern edges of the Goldfields Preserve, but the DEIR does not describe how activities in uplands adjoining preserve might degrade or otherwise impact quality habitat in the preserve. **These activities must be described and discussed in the Master Plan DEIR.**

7 **II. The current project is likely to degrade additional wetlands without considering the total cumulative impacts because the DEIR does not adequately emphasize avoiding impacts or mitigating to avoid further net species loss from implementation of this project stage.**

The DEIR provides recent population estimates but does not adequately describe population trends at the individual preserves or changes in preserve habitat quality over time. **These factors represent cumulative impacts that have caused substantial losses to ecosystem values and functions over the time since initiation of the airport project.** In particular, the DEIR provides no way to assess impacts on the survivability of Western Pond Turtles in the project areas.

Therefore, the total cumulative impacts of all airport projects must be considered in the Master Plan DEIR.

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SCWC members strongly recommend:

8 • Evaluation of current conditions on the whole Airport property, and comparison with official maps of habitat conditions prior to airport construction to form a basis for restoring historic plant populations and wetland habitat, which have been lost over time due to Airport operations, including but not limited to irrigation, grading, and mowing.

9 • Establishment of an independent advisory group to assess species and habitat restoration potential, and to draft a restoration plan for adoption and implementation as part of the short-term Master Plan Implementation Project.

10 • Consider relocation of the proposed road identified in Project Element 1S4 away from the Goldfields Preserve, removal of the existing road that bisects the Preserve, and restoration of the wetland as project options.

11 • Relocate the proposed road identified in Project Element 10L1 away from the vicinity of the Field 17 Wetland Preserve.

III. The DEIR's long-term conservation goals for the current set of expansion and upgrade projects do not meet the County's priority conservation goals, nor do they include monitoring programs or programmatic funding sources to prevent further net loss of the biotic resources within and adjacent to the present or expanded airport.

12 The SCWC therefore asserts that the County General Plan's standards require that **mitigation for Short and Long Term projects described in this Airport Master Plan must include**:

- accurate descriptions of remaining biological functions in the previously established preserves, the cumulative losses, and a long-term management plan. The management plan must state objectives that are measurable over time

- a comprehensive long term monitoring and an adaptive management program to prevent further degradation and even meet the standard of avoiding net loss. This process must take place with full transparency and public involvement.

IV. By segmenting the Airport projects, the County seeks lower mitigation standards and eligibility for a less rigorous environmental review.

13 Based on exhibits provided in the DEIR, Project Elements 2A3, 2A4 and 2A5 will impact *occupied* Burke's goldfields habitat. Thus, these Project Elements will require higher mitigation ratios under the terms of the Santa Rosa Plain Conservation Strategy. In addition, the population sizes reported in 2009 and 2010 prevent appending the long-term project to the 2007 Programmatic Biological Opinion (PBO). The cited Project Elements will require a more formal consultation with the US Fish and Wildlife Service.

14 For these reasons, SCWC believes that attaining General Plan goals will require addition of a goal statement to the DEIR, which at minimum must:

1. **Acknowledge that Santa Rosa Plain Conservation Strategy mitigation ratios are a minimum standard.**

COMMENT LETTER B3 – LETTER SUBMITTED BY SONOMA COUNTY WATER COALITION
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2. **Adopt language from the PBO, page 23**, stating that "the Conservation Strategy will not preserve the species unless implemented by the appropriate agencies"

3. Set **avoidance of habitat segmentation in the Airport Study Area as the top priority**. For this goal to be achieved, the County should adopt Alternative 13, which changes the project from a lengthening of the northwest-southeast oriented runway to simply separating the runways for safety. Alternative 13 avoids many significant impacts, including loss of a large mammals wildlife corridor, and also would limit the noise impacts of regional jets on the human population.

14

4. Designate **mitigation lands to cover as much of a contiguous local watershed as possible**. Parcels adjoining the Airport study area to the northeast, along Sanders Road should be considered high priority candidate mitigation sites, consistent with Objective 3 of the Windsor Plant Conservation Area of the Santa Rosa Plain Conservation Strategy. Extant Burke's Goldfields habitat in the Windsor area should be acquired to maintain the species range.

5. Establish a **program for enhancement and restoration of species preserves in perpetuity**, to ensure that plants and animal populations remain viable forever.

6. Establish and commit funding for a **comprehensive monitoring program** as part of the project permit, with a robust adaptive management plan. Periodic review of monitoring results must be reported to the public, with opportunity for public input. Inspection tours must be offered to members of the public, so that they can assess whether or not the portrayal of impacts is accurate.

All the objectives and steps for mitigating impacts, the enhancements and (or) restorations, and monitoring/assessment programs must be written into the project permits.

Sincerely,

Jane Nielson, Ph.D.
Sonoma County Water Coalition

RESPONSES TO COMMENT LETTER B3 – LETTER SUBMITTED BY SONOMA COUNTY WATER COALITION

B3-1 This comment does not specifically address the adequacy of the analyses contained in the Draft EIR. The commenter's disagreement with the conclusions of the Draft EIR regarding less-than-significant impacts is acknowledged and will be considered by the decision-makers at the County of Sonoma Planning Commission and the County of Sonoma Board of Supervisors.

B3-2 The comment contends that the Draft EIR assessment of the Proposed Project is inconsistent with Policy OSRC-7b of the Sonoma County General Plan 2020 (General Plan), but offers no evidence to support this conclusion. The County disagrees with the conclusory assertion in the comment that the Proposed Project is inconsistent with General Plan Policy OSRC-7b. Consistent with the policy, the Proposed Project has been designed to avoid impacts to biological resources to the maximum extent feasible. Impacts to the Airport's various habitat types will be mitigated so as to ensure no net loss. All impacts to biological resources will be mitigated to the level of less-than-significant, with the exception of the wildlife corridor impact, which the Draft EIR recognizes as significant impact. For a complete discussion of the limitations imposed on the management of biological resources onsite at the Airport, please see Master Response B on page 4-4.

Finally, it is unclear what the commenter means by "Approved Conservation Plans." The County assumes that the comment regarding "Approved Conservation Plans" refers to the Santa Rosa Plain Conservation Strategy. Contrary to the commenter's unsupported assertion that the Draft EIR's findings conflict with the Santa Rosa Plain Conservation Strategy, Impact 3.4.9 on pages 3.4-44 and 3.4-45 of the Draft EIR provides an analysis that demonstrates the consistency of the Proposed Project with the Santa Rosa Plain Conservation Strategy.

B3-3 The comment asserts that the Draft EIR's analysis of wetlands impacts is somehow deficient because of purported failures to adequately manage and/or enforce prior mitigation preserves to avoid net loss of wetlands. However, the comment offers no evidence of such alleged failures or how such impacts affect the adequacy of the mitigation measures proposed for project-related impacts. The County is not aware of any net loss of wetlands resulting from past preserve management at the Airport. The Proposed Project has been designed to carefully minimize direct and indirect impacts to wetlands and associated species in the preserves. Additionally, the Proposed Project will avoid any direct or indirect short-term impacts to Burke's goldfields populations both within and outside the preserves. Mitigation Measure 3.4.13 on page 3.4-50 of the Draft EIR and Mitigation Measure 3.4.22 on page3.4-55 of the Draft EIR require a range of measures to be implemented before and during construction work to avoid indirect disturbances of wetlands and other sensitive habitats. Moreover, in accordance with CEQA Guidelines § 15097, the County will adopt and implement a Mitigation Monitoring and Reporting Plan to ensure the implementation and ongoing monitoring of mitigation imposed on the Proposed Project. Finally, for a full discussion of the limitations imposed on the management of biological resources onsite at the Airport, please also see Master Response B on page 4-4.

B3-4 Contrary to commenter's assertions, focusing the Draft EIR's analysis on the project-level impacts of the short-term project elements and the reasonably foreseeable regional influences, secondary effects, and cumulative impacts of the long-term project elements (which are conceptual, at best, at this time) is neither "segmentation" nor "piecemealing" under the California Environmental Quality Act (CEQA). The Draft EIR fully analyzes the impacts of the short-term project elements at a project-level detail. Consistent with CEQA, the Draft EIR addresses the reasonably foreseeable impacts associated with the long-term project elements at a program level.[47] Conceptual, long-range plans subject to revision are not required to be included as "reasonably foreseeable" components of a project.[48]

The Draft EIR is intended to serve as a "first-tier" EIR – often called a "program" EIR – for the long-term project elements. Such a tiered approach to environmental review is particularly appropriate to address the broad environmental issues (*e.g.* cumulative impacts, growth inducement, and regional impacts) affecting a large physical area associated with a proposed general plan, community plan, or similar regulatory program or plan, like the Airport Master Plan Update.[49]

The Airport Master Plan Update is a comprehensive planning document designed to guide the long-range development of the Airport. It identifies not only short-range projects for which designs have been fleshed out in some detail, but also long-range projects which will be implemented, if at all, over time depending on need and available funding. While short-term project elements have been developed in sufficient detail to allow for a project-level analysis, long-term project elements are still conceptual and are based on very limited engineering and environmental investigation. Under the tiered review process, the Draft EIR acts as an analytical superstructure for subsequent more detailed analysis of the individual long-term project-elements. In a nutshell, the Draft EIR identifies those probable environmental effects that can be identified at this time. For those impacts that cannot be predicted without undue speculation or for which the deferral of specific analysis is appropriate, the County may lawfully defer such analysis until later points in the program approval or implementation process. As discussed in detail in the impact analyses in the Draft EIR, once the precise scope, design, and location for those elements are more clearly defined and brought forward for public review, a subsequent project-level environmental review will be conducted to address site-specific concerns for each long-term project element.

Conducting the program-level review at this early conceptual stage allows the County to conduct a more exhaustive consideration of the effects and alternatives than would be practical in an EIR on an individual project action, and it ensures consideration of the cumulative impacts that might be slighted in a case-by-case analysis.[50] The Draft EIR commits the County to conducting a CEQA-compliant environmental review prior to the approval and implementation of each long-term project element. This mandatory, further

[47] Cal. Public Res. Code § 21093(a); CEQA Guidelines §15168.
[48] *See Berkeley Keep Jets Over the Bay Com. V. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1357-1363.
[49] Cal. Public Res. Code § 21093(a); CEQA Guidelines § 15152(a).
[50] CEQA Guidelines § 15168(b).

environmental review obviates any claim that the County has "approved" a long-term element or improperly segmented the relevant project descriptions.[51]

For a full discussion of "segmenting", please see Master Response F on page 4-17.

B3-5 The Commenter's statement that the County can fully identify and discuss impacts associated with long-term project elements that are conceptual only is misguided. As the courts have made clear, EIRs are required to address the reasonably foreseeable impacts associated with a project.[52] Conceptual, long-range plans subject to revision are not required to be included as "reasonably foreseeable" components of a project.[53] A lead agency can defer analysis for those impacts that cannot be predicted without undue speculation or for which the deferral of specific analysis is appropriate until later points in the program approval or implementation process.[54] For a more complete discussion of program-level review, please also see Master Response F on page 4-17.

B3-6 Contrary to commenter's assertions, the Draft EIR is required to address the potential impacts of the Proposed Project on existing baseline conditions at the Airport; it is not required to address or mitigate conditions that may or may not have existed historically, nor is it required to address past land management practices at the Airport that may or may not have affected the historical conditions. Past land management practices are relevant to the Draft EIR only to the extent that they may have helped form the basis of the existing baseline conditions on the site. Nevertheless, it should be noted that past development and management activities that may have caused degradation of wetlands and associated species at the Airport largely occurred more than two decades ago, prior to when Airport management became better aware of the need to protect and manage sensitive natural resources within the Airport boundaries (consistent with maintaining an active airport operational facility), and before Burke's goldfields and other vernal pool plant species became federally listed as endangered species. For example the loss of the historic occurrence of Sebastopol meadowfoam appears to have occurred prior to 1987 based on the result of repeated subsequent surveys of the Goldfields Preserve.[55]

The Draft EIR recognizes that the existing preserves at the Airport are functioning habitats that require protection. As stated in the response to comment #B3-3 of the letter

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[51] *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 742 [rejecting a segmentation claim where the agency "committed itself to conduct individual environmental assessments" of potential future projects].

[52] Cal. Public Res. Code § 21093(a); CEQA Guidelines §15168.

[53] *See Berkeley Keep Jets Over the Bay Com. V. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1357-1363.

[54] *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 373 [CEQA review does not extend to "an element of a master plan which has not been proposed for development," and that deferral of environmental review is proper where the county "*cannot provide meaningful information about a speculative future project*." (distinguishing cases in which agencies "impermissibly approved a project which envisions future action without future environmental review") (Italics added.].

[55] Western Ecological Services Company, Inc. (WESCO). 1993. Fifth Year Monitoring Report County Service Area 31, Airport Wastewater Storage Pond Wetland Mitigation Project, U.S. Army Corps of Engineers Project File No. 16965N96. Prepared for County Service Area 31, County of Sonoma, Dept. of Public Works. WESCO, Novato, California.

Patterson, C. A. 1987. Burke's Goldfields (*Lasthenia burkei*) Survey Report, Sonoma County Airport, Sonoma County, California. Prepared for Sonoma County Airport, Santa Rosa, California. C.A. Patterson, El Cerrito, California.

submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72, all elements of the Proposed Project have been designed to avoid or minimize direct disturbances of preserve areas. Implementation of Mitigation Measure 3.4.13 on page 3.4-50 of the Draft EIR and Mitigation Measure 3.4.22 on page3.4-55 of the Draft EIR will avoid indirect disturbances of the preserves. For a discussion of limitations on the management of biological resources onsite at the Airport, please see Master Response B on page 4-4.

B3-7 For a discussion of the management of biological resources at the Airport, please see Master Response B on page 4-4. Contrary to the commenter's statements, the Draft EIR fully analyzes the cumulative impacts of all Airport projects on biological resources. While FAA regulations and other operational considerations may mandate in some circumstances that mitigation occur off site, all project-related impacts will be mitigated to a less than significant level with the exception of the loss of wildlife migration corridor identified in Impact 3.4.14 on page 3.4-50 of the DEIR.

B3-8 The suggestion that historic conditions be compared to current conditions in order to restore historic wetland habitat and associated plant populations is acknowledged. However, as stated in the response to comment #B3-6 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72, the Draft EIR is not required to address or mitigate conditions that may or may not have existed historically; it only needs to address the proposed project's impacts to existing (baseline) conditions. Additionally, it should be noted that FAA guidelines under AC 150/5200-33 would generally preclude the restoration of historic wetlands or the establishment of new wetlands within the Airport boundaries. This would likely preclude any modifications to land management activities that would promote the restoration of historic wetlands that may have occurred. The FAA considers wetlands to be wildlife attractants; seasonal wetlands such as what may have occurred historically at the Airport, are likely to attract seasonal populations of waterfowl and shorebirds known to be hazardous to flight operations. For this reason, all mitigation for wetland impacts will be conducted off-site. For a more complete discussion on the management of biological resources at the Airport, see Master Response B on page 4-4.

B3-9 The suggestion that an independent advisory group be established to draft a habitat restoration plan for the Airport is acknowledged. However, due to the aforementioned FAA restrictions on restoring/establishing wildlife attracting habitat, drafting of such a plan would not be feasible. Please also see Master Response B on page 4-4.

B3-10 The road identified as project element 1S4 is part of the service road that will loop the Airport. This road will be used by airport operations and emergency services vehicles. To fulfill its purpose it must be a continuous loop around the airfield. The proposed alignment was chosen to avoid intruding into the existing Goldfield's preserve. An alignment east of the existing Goldfield's preserve is not possible because FAA standards do not permit a service road that close to a runway. An alignment west of the Goldfield's preserve is not possible because the preserve boundary extends to the wingtip clearance setback for Taxiway U and a service road could not be placed where it would conflict with taxiing aircraft.

B3-11 The road identified as part of project element 10L1 provides access to a possible site for a replacement air traffic control tower. The road alignment shown follows an existing

gravel service road. This is one of two possible sites for a replacement air traffic control tower shown in the Master Plan Update. However, these sites are possible locations for the tower; the FAA will conduct an independent siting study at the time the agency proposes relocating the tower. The siting study will need to consider environmental impacts of alternate sites and site designs. Project-specific environmental review documentation in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) will be prepared for the tower project once precise scope, design, and potential locations are more refined. If a midfield site such as shown in project element 10L1 is considered by the FAA, the value of choosing an alternative alignment for the access road can be evaluated at that time.

B3-12 The Proposed Project would not result in net losses of wetlands and other biological resources, with the exception of the wildlife corridor associated with Airport Creek. Mitigation Measures 3.4.1 through 3.4.14 on pages 3.4-37 through 3.4-51 of the Draft EIR would ensure that impacts from short-term project elements would be mitigated to the level of less-than-significant. Although site specific designs and exact locations of long-term project elements have not yet been developed, Mitigation Measures 3.4.15 through 3.4.22 on pages 3.4-52 through 3.4-55 of the Draft EIR would ensure that any impacts associated with these long-term project elements, should they occur, also would be mitigated to the level of less-than-significant. Therefore, the County does not agree that there is a need to include an additional mitigation measure for avoiding long-term losses of wetlands or other biological resources.

The County appreciates the recommendation for developing a long-term monitoring and adaptive management program for the preserve areas. Such a long-term plan could effectively provide long-term protection of the preserves' biological resources, provided that the plan would not conflict with FAA guidelines under AC 150/5200-33, nor conflict with airport operational requirements. Consequently, page 3.4-47, Mitigation Measure 3.4.10A, new bullet of the Draft EIR is added as follows:

> **Additional Mitigation.** The mitigation ratio provided hereunder constitutes a minimum required ratio that may be modified by the regulatory agencies under the applicable permitting processes. If such additional mitigation is required, one option that may be considered would be to develop a comprehensive long-term monitoring and adaptive management program for wetlands and associated species in the Airport's designated preserves. The plan would be designed to help maintain the quality and quantity of existing wetland habitat in the preserves, consistent with FAA guidelines under AC 150/5200-33, and consistent with airport operational requirements. The plan would be subject to the review and approval of the regulatory agencies.

B3-13 The commenter's statement that the County has "segmented" the Proposed Project is not correct. For a full discussion of this issue see the response to comment #B3-4 of this letter. The site-specific designs and exact locations of Project Elements 2A3, 2A4 and 2A5 will seek to avoid impacts to Burke's goldfields populations to the maximum extent feasible. However, the commenter is correct in pointing out that there is a potential for Elements 2A3 and 2A4 to directly affect existing goldfield populations. Therefore, Impact 3.4.15 and Mitigation Measure 3.4.15 on pages 3.4-51 and 3.4-52 of the Draft EIR have been revised to read (deleted text in ~~strikethrough~~ and new text in double underline):

Impact 3.4.15: Loss of Occupied or Suitable Habitat for Burke's Goldfields, Sebastopol Meadowfoam, and Sonoma Sunshine Associated with Long-Term Project Elements

Implementation of the long-term project elements, as currently described in the Master Plan, could potentially affect a population of Burke's goldfields in the vicinity of the Runway 32 run-up apron ~~would not affect any existing populations of these three federal and state-listed Endangered species, nor~~ but would ~~it~~ not affect any other wetlands where this ~~these~~ species or the other two federally-listed plant species occur or have historically occurred. Additionally, ~~However,~~ under the Conservation Strategy and PBO, all of the Airport's vernal pools and other seasonal wetlands are considered to be suitable habitat for the three plant species. Loss of such habitat is considered an adverse impact because the habitat may retain a remnant seed bank.

The long-term project elements are still conceptual, and specific development plans have not been prepared at this time. Until the precise scope, design, and location for each long-term project element is more clearly defined, any attempt to quantify impacts to these three species or any wetlands in the Airport Study Area would be purely speculative. Depending on where and if these long-term project elements are implemented, a loss of ~~suitable~~ habitat for these three species could occur. For example, replacing the terminal building and control tower in their existing locations would have no impact on these species or any wetlands; however, relocating the control tower or expanding the footprint of the terminal building could affect these sensitive resources. This habitat loss would constitute a potentially significant impact. Each long-term project element will be studied in a focused project-level environmental analysis before it is approved or implemented. To reduce any potentially significant impacts to occupied or suitable habitat for Burke's goldfields, and suitable habitat for Sebastopol meadowfoam, and Sonoma sunshine, the following mitigation measure shall be implemented for long-term project elements.

Mitigation Measure 3.4.15

As each new long-term project element is proposed under the Master Plan, a project-level environmental review shall be conducted to identify any potential impacts to occupied or suitable habitat for Burke's goldfields, or suitable habitat for Sebastopol meadowfoam, and Sonoma sunshine, or wetland areas. Impacts shall be avoided to the maximum extent feasible. If this review identifies impacts to these resources, the County shall either purchase mitigation credits from a USFWS/CDFG approved off-site mitigation or conservation bank on the Santa Rosa Plain or shall acquire land with established habitat for these species at an off-site mitigation area in the Santa Rosa Plain at a ratio approved by the resource agencies. All such mitigation shall be consistent with the guidelines of the Santa Rosa Plain Conservation Strategy, if still in effect at the time of the proposed work.

B3-14 The Draft EIR addresses all applicable goals cited in the comment. Section 3.4.1 on pages 3.4-1 through 3.4-7 of the DEIR provides a discussion of the applicability of the Santa Rosa Plain Conservation Strategy (and associated Programmatic Biological

Opinion – PBO) to the Proposed Project. Impact 3.4.9 on pages 3.4-44 through 3.4-45 of the Draft EIR provides a detailed analysis of the Proposed Project's compliance with various guidelines under the Santa Rosa Plain Conservation Strategy. Mitigation Measures 3.4.2, 3.4.3B, and 3.4.10A on pages 3.4-38, 3.4-39, and 3.4-47 of the Draft EIR, respectively, require compliance with the minimum mitigation ratios under the Conservation Strategy and the PBO.

For a more complete discussion of Alternative 13, please see Master Response E on page 4-10.

With respect to off-site mitigation lands, the County intends to explore all available options for off-site mitigation, including lands adjoining the Airport Study Area and lands in the Windsor Plant Conservation Area. However, it should be noted that the Conservation Strategy does not require that mitigation for impacts to suitable habitat for federally-listed plant species be performed in the immediate watershed or in the Windsor Plant Conservation Area.

With regard to the possibility of establishing and funding a program for long-term preserve management, please see the response to comment #B3-12 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

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SIERRA CLUB
FOUNDED 1892

Sonoma Group
55A Ridgeway Avenue, Santa Rosa, CA

September 17, 2011

FOR THE PUBLIC RECORD
Sonoma County Airport Master Plan Draft Environmental Impact Report Review

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

Attention: Ms. Crystal Acker

Reference: 1) Draft Environmental Impact Report Dated July 2011
2) Proposed Revisions to Sonoma County General Plan 2020

Dear Ms. Acker:

1 The Sierra Club appreciates this opportunity to submit comments on the Draft EIR and General Plan revisions regarding a project to permit more extensive commercial air operations at Sonoma County Airport. Among our concerns is the fact that the environmental study is based on average sound intensities that inadequately forecast community responses to the "spiking" sounds of 21daily commercial flights. If such operations turn out to have an adverse impact on neighborhoods within hearing of the airport, the peace and quiet of these places can never be recovered. A community response assessment should be performed. (See Attachment, Paragraphs 1-3 for details of our noise concerns.)

2 We propose a reasonable test, using the types of jet aircraft that would actually use the proposed 6,000 foot runways, to see how many people under the flight path actually experience disturbances or annoyance. Direct responses to a test of this kind will be far more informative than any consultant's forecast. Policy makers and the public should not be asked to become experts in the meaning of instrument recordings and averaged decibel levels in order to anticipate the ways that communities would respond to the noise of 21 daily jet take offs and landings. (See Attachment, Par. #2)

3 Because one of the proposed General Plan amendments would delete the 95,000 pound weight limit for the runways, it should be assumed that Boing 737 and similar aircraft would be used for at least some of the more popular commercial flights. This does not seem to be acknowledged in the DEIR, which appears to be based entirely upon

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3 "regional" commercial jets. The Draft EIR should be revised and recirculated to take into account this proposed General Plan amendment.

4 The Draft EIR also makes a fundamental error by combining noise data for light general aviation activity with the heavier commercial jet aircraft that are the subject of this project. Because the numbers and sounds of light aircraft would not be significantly affected by the runway-lengthening project, they should be excluded from the noise analysis. The averaging of sound data that combines sounds of light planes with commercial aircraft in the DEIR makes it impossible to understand the noise impacts of the proposed project. A separate analysis must be done to address the impact of the heavier aircraft that are the focus of the project. (See Attachment, Par. #3.)

5 The project would substantially increase greenhouse gas emissions according to the DEIR. All feasible mitigations of this impact must be utilized before a statement of overriding conditions may be considered. However, we see no discussion of mitigations for the GHG emissions resulting from the project. [DEIR p.3.3-38] Numerous avenues are available to mitigate greenhouse gas emissions at reasonable cost, including the use of emission-free ground transportation, installation of photovoltaic systems, and as a last resort, the purchase of carbon credits. Please describe the range of available mitigation measures, evaluate their feasibility, and specify all of the feasible measures as conditions of approval before suggesting any overriding considerations.

6 We also suggest that mitigation for impacts on biological resources should be focused on lands that are near the airport. Nearby areas have species that are worthy of protection, and it is most desirable to locate mitigations nearby. The Attachment has more detailed comments, including a discussion of the Alternatives Analysis.

7 Due to the Federal funding expected for this project, a Federal environmental assessment is being prepared under the National Environmental Policy Act. That study should contain important information, including estimates of future passenger volumes that may differ from those in the DEIR. It seems inappropriate to ignore the Federal study in making policy decisions about airport development. We suggest that this Draft EIR and the proposed General Plan revisions be revised and recirculated in response to the currently known concerns. When the results of the Federal studies become known, they should be considered in a revised Draft EIR.

If you wish to discuss these issues further, with respect to greenhouse gas and noise issues, please contact David Oliver at 707-763-9805. With respect to biological mitigation issues, please contact John Herrick at 707-887-8542. Thank you for your consideration.

Sincerely,

Steve Birdlebough, Chair

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SIERRA CLUB -- DETAILED COMMENTS
Sonoma County Airport Master Plan Draft Environmental Impact Report Review

NOISE ISSUES:

8

1. The Draft EIR fails to address the *community reaction* to the noises of the 21 daily commercial flights that could use the proposed 6,000 foot runway each day if this project is approved. Aircraft noise is more annoying than other sounds [see, *e.g.* Schoner, *Criteria for assessment of noise annoyance,* 53 (4) Noise Control Eng. J., Jul.-Aug. 2005 at p. 137]. The author points out that many factors can cause people to experience annoyance due to noise intrusions, and there are large variations between predicted and reported levels of community reactions. Relevant factors include sound duration, frequency, tone, and the absence of competing sounds [see, *e.g.* Kinsler, *Fundamentals of Acoustics*, p. 297 3d Ed.]. These factors are particularly important in the quiet, semi-rural neighborhoods closest to the Sonoma County Airport, where they could impact property values and tourism, and they also apply to more distant locations under flight-paths. Without an analysis of the community response to the sounds of commercial aircraft the EIR is deficient.

9

2. We suggest that the best way to gauge the noise impacts of 21 daily commercial jet takeoffs and landings is by a test to see how many people actually complain. The aircraft used in these tests should be "regional" and Boeing 737 jets; and they would have slightly reduced take off weights to enable them to use the present 5,100 foot runway. Approaches from the north should be flown down to a 500 foot altitude along the glide-path to the threshold of the proposed 6,000 foot Runway 14/32. There should be a steady build-up in the number of daily flights to the full 21-commercial-type movements per day, and the test should continue as long as the number of complaints is increasing. The timing of flights throughout the day should match likely airline schedules, starting at about 6:00 am and ending around midnight. The resulting level of citizen complaints would be far more informative than any forecast, and the cost of this test would be nominal compared to the multi-million dollar price of the proposed project.

10

3. It is clear that the noises produced by 21 commercial jet aircraft taking off and landing would greatly exceed the present sound levels experienced by neighbors. Yet the DEIR implies that there is only a marginal difference between sound levels for the project and the no-project alternatives in the year 2030 [DEIR p. 3.10-41]. This feat of denial results from the combination of two averaging processes: First, the projected number of general aviation movements is optimistically high (and probably over-estimated), so that the noises in decibels of these mostly light aircraft overwhelm the data for the larger commercial jets. As a result, the fact that the sounds of commercial take-offs and landings would be more frequent and louder than if the runways are not lengthened disappears into the average sounds of all aircraft. Second the CNEL sound-averaging protocol has the effect of equating a long hum with an ear-splitting sound burst; this

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10 downplays the annoyance factor of "spiking" noises such as jet takeoffs and landings, especially those that occur in the evening hours and at night. Please include sound-contour maps in the EIR, showing comparisons at 55 dB, and 65 dB, for takeoffs and landings of Q-400 turboprop, regional jet, and Boeing 737 aircraft using the lengthened runways. Please also note that because aircraft noise is more annoying than automobile sound, ISO 1996-1:2003 suggests that a 3 dB penalty be applied to any day-night average sound data used in connection with air operations. We recommend that this ISO standard be applied in this case. Also, the EIR should recognize that the FAA has set a rather high threshold for its noise compatibility/land use mitigation funding, and that any costs of alleviating the annoyances of commercial aircraft noise may not be reimbursable from federal sources.

11 4. The flight envelope specifications for the various aircraft that are known to be potential users of the extended runways are not described anywhere in the DEIR. This information is key supporting data for the DEIR. One aircraft, the Embraer ERJ190, shown as having the highest landing take-off cycles (LTOs) of any aircraft in the 2015 No Project Alternative baseline on Table 3-2 has been shown previously by the DEIR preparation team as "Cannot Use Existing Runway" in their 3 March 2011 briefing. Note that the ERJ190's 2009 LTO figure is zero. The demand characteristics shown on Table 3-2 are key to determining other noise evaluations in the DEIR.

12 5. With respect to noise impacts of commercial jet aircraft, the statement in the last paragraph on the Page 8 of the September 1, 2011 Planning Commission Staff Report [lines 12-16] must be conformed to the Power-Point information presented at Windsor High School on that date. The descriptions of "regional" jet aircraft clearly showed them to have noise levels 5 decibels higher than the turboprop aircraft used at present.

13 6. Noise impact contours and other analysis appear to be modeled on the quieter aircraft rather than on all aircraft that may use the extended runways. Please provide models for all expected aircraft types.

14 7. Appendix M, Table 5.3, shows evening and night departures of the relatively quiet Q400, but no departures of noisier aircraft. Please revise Appendix M Table 5.3 to show evening departures of all aircraft types.

15 8. Appendix M, Section 6.1.2, Sleep Disturbance Analysis, uses baseline data from 2008 whereas Appendix M, Baseline Noise Conditions, states 2009 is used as the baseline year. Please revise Section 6.1.2 to use 2009 as the baseline.

16 9. The documentation fails to substantiate demand forecasts for the various aircraft types. Please provide the basis for these estimates. Commercial carriers have dropped service to Sonoma County in the past, and so the risk of repeating this experience should be evaluated. If there are conditions under which future

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16 commercial air travel in Sonoma County could decline substantially, the effects on usage of the various classes of aircraft should be discussed. The public and policy makers are entitled to know whether the reasons for rejecting these scenarios are based on a sound factual analysis.

ALTERNATIVES ANALYSIS

17 1. Alternative #1 (Use another airport) deserves further discussion. Most air travelers currently use other airports. Under various travel demand and fuel pricing scenarios, commercial air travel in Sonoma County might decline and could even cease in the future. The public and policy makers are entitled to know the reasons for rejecting these scenarios.

2. The response to Alternative 13 for the current runway configuration (shortening of Runway 1/19) does not adequately evaluate this option. Please correct the following deficiencies:

18 *Objection #1: "This alternative would not result in providing the standard Runway Safety Area …"* A Runway Safety Area must be capable of supporting an aircraft that runs off the paved runway. The proposed shortened Runway 1/19 could have a better-than-average safety area at its north end, because much of it could consist of displaced threshold on the existing runway.

19 *Objection #2: The alternative "would not accommodate regional jet operations at the Airport …"* The shortening of Runway 1/19 would not prevent later lengthening of Runway 14/32 when the number of passengers is large enough to possibly attract an airline that has connections to Salt Lake City or Denver. Expenditures to extend Runway 14/32 at this time are unlikely to attract more air carriers to Santa Rosa, because passenger loads must rise about 60% to support 3-5 additional daily flights before another airline could profitably begin service. Safety issues should not be confused with convenience issues.

20 *Objection #3: "… this alternative would result in a reduction in the use of Runway 1/19 for departures which would shift almost all departures to Runway 14/32, which would increase delays for aircraft landing on Runway 14/32."* This is incorrect, partly because any aircraft that is landing has priority over those waiting to take off. Further, the vast majority of commercial and heavier aircraft already use Runway 14/32. They will continue to do so in the future, regardless of the length of the other runway. For lighter aircraft that do not require a runway longer than 4,000 feet, wind direction is normally the deciding factor in runway selection. Reducing the length of Runway 1/19 should not have a substantial impact on its use.

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21 *Objection #4: "the noise contour associated with Runway 14/32 would be increased"* For the reasons stated in #3 above, we think there would be no substantial change in noise contours due to shortening Runway 1/19.

22 *Objection #5: "Reducing the length of Runway 1/19 would result in having a runway that cannot accommodate most of the aircraft that currently operate at the Airport."* We think most of the general aviation fleet, particularly the recreational users that fly most often on weekends, can easily use a 4,000 foot runway. Given the light usage of the airport generally, it does not appear to us that shortening the secondary runway would cause any significant delays.

23 *Objection #6: "To access Runway 1/19 from the east side of the Airport, a midfield crossing of Runway 14/32 would be required, which is a reduction in safety."* Given the light usage of the airport, and considering that it has a control tower, we seriously question whether midfield crossings present a significant safety hazard. If general aviation usage should increase substantially in the future, a taxiway around the end of runway 14 could take aircraft to runway 19 on busy days without using a mid-field crossing.

GENERAL PLAN CHANGES, ETC.

24 1. No justification is stated for the proposed deletion of General Plan section 4.1 which currently states that: "air carrier activity could be accommodated at Charles M. Schultz Sonoma County Airport without unacceptable environmental impacts, provided the type of aircraft and number of aircraft operations are appropriately limited . . . ." For the reasons stated above, it seems clear that limits are essential to avoidance of unacceptable environmental impacts.

25 2. The General Plan discussion of "expanded commercial cargo freight facilities" in the Facility Requirements section of the General Plan is very cursory. These may include night operations. Please describe the parameters for this expansion, and the impacts of cargo flights as well as ground operations. Suggest appropriate limits and mitigations for these activities.

26 3. Please provide a more complete explanation of the "Significant" safety impact in 3.11.2 and the effects on property owners of mitigation measure 3.9-1. During the Planning Commission hearing there was concern about dwellings under the flight path. We recommend a moratorium on construction of further buildings under the flight path to abate safety risk.

27 4. Chapter 7 lists Persons and Agencies Consulted. We are advised that Rodney Strong Vineyard was not consulted although the proposed airport expansion may have a major influence on its operations, especially its outdoors concert series.

28 5. Please describe the manner in which airport modification costs would be covered if the plan shown in Table 2-9 is not successful

RESPONSES TO COMMENT LETTER B4 – LETTER SUBMITTED BY SIERRA CLUB

B4-1 This comment is general in nature regarding the noise metrics and the noise analysis contained in the Draft EIR. The commenter has provided more detailed comments on these topics as part of comments #B4-8, #B4-9, and #B4-10. For detailed discussions of these issues, please see the response to comments #B4-8, B4-9, and B4-10 starting on page 5-83.

B4-2 test proposed by the commenter is neither feasible nor required by law. An airport noise complaint analysis is not required by the CEQA process and would be of limited use in any event. Noise complaints have been studied and have never been correlated to noise levels or community attitudes about noise levels (see Appendix M of the Draft EIR). The noise analysis presented in Section 3.10 and Appendix M of the Draft EIR fully analyzes noise impacts associated with the Proposed Project and complies with CEQA. Community measurement of long-term noise exposure is measured in terms of annoyance and not complaints. Annoyance and the Community Noise Equivalent Level (CNEL), which was used to identify noise impacts in the Draft EIR, have been correlated and CNEL is the industry- and FAA-accepted method of measuring noise impacts. It also is important to reiterate that CNEL is prescribed by both the State of California and the FAA for studying aircraft noise. In addition, contrary to the commenter's suggestion, the noise study did use a mix of jet aircraft expected to use the 6,000-foot runways proposed by the project. Please also see the response to comment #B4-8 of this letter for a more detailed discussion of the CNEL methodology.

B4-3 The Boeing 737 aircraft has operated and is expected to continue to operate at the Airport. Therefore, the Boeing 737 is included in forecast years and included in the noise exposure assessment. The number of Boeing 737 operations in the forecast years is shown in Appendix M, Table 5-1 of the Draft EIR. It is important to note that the 95,000 pounds applies to commercial aircraft only and not general aviation aircraft and the FAA has found that this weight limit is discriminatory. In addition, the existing runway is weight rated to approximately 150,000 pounds.

B4-4 The commenter's statement that the Draft EIR "makes a fundamental error by combining noise data for light general aviation activity with the heavier commercial jet aircraft" is incorrect. While the commenter correctly notes that lighter general aviation aircraft do not have a great influence on the noise contours at the Airport, such aircraft do contribute to the overall noise contours and, consistent with CEQA, must be considered as part of the proposed project's noise analysis. The Integrated Noise Model (INM) includes all aircraft in determining the overall noise contour associated with an Airport. If the Draft EIR were to eliminate lighter general aviation aircraft, as suggested by the commenter, it would be misleading and violate CEQA. Moreover, the resultant noise contours would not be representative of either the existing or future noise environment in the Airport vicinity. In fact, eliminating lighter general aviation aircraft would result in *smaller* noise contours than what is presented in the Draft EIR and would understate the noise contours associated with the Proposed Project.

B4-5 The commenter's statement that 'the project would substantially increase greenhouse gas emissions' is misleading. The short-term project elements of Proposed Project would not have a significant impact on greenhouse gas (GHG) emission in 2015. As demonstrated in Table 3.3-10 on page 3.3-22 of the Draft EIR, GHG emissions

associated with construction of the short-term project elements are well below the threshold established by BAAQMD and, therefore, will be less than significant. The discussion under Impact 3.3.3 on pages 3.3-26 and 3.3-27 of the Draft EIR shows that the operational increases in GHG emissions in 2015 associated with implementation of the short-term project elements will be less-than significant. Therefore, the impacts associated with GHG emissions would not occur for the year 2015. The impact only occurs in the year 2030 and is considered to be a worst-case scenario because no credit was given to the reduction in vehicle miles traveled (VMT) that would occur with an increase in the number of passengers at the Airport and because the analysis assumed that all long-term project elements would be implemented. As shown in Table 3.3-29 on page 3.3-39 of the Draft EIR, the increase in GHG emissions that would occur with the Proposed Project in 2030 compared to the GHG emissions that would occur without the Proposed Project in 2030 exceeds the Bay Area Air Quality Management District threshold of 1,100 metric tons. It is important to note that with the Proposed Project, the actual increase in GHG emissions is 11% compared to the GHG emissions without the Proposed Project. Therefore, the commenter's assertion that it is substantially greater is not correct. In fact, coupled with the potential reduction in VMT associated with a greater number of North Coast region passengers using the Airport (and not traveling to San Francisco International Airport or Oakland International Airport), there is the potential for the Proposed Project to actually have less GHG emissions in 2030 compared to the scenario without the Proposed Project. In addition, the Airport is analyzing a variety of measures that can be implemented to reduce GHG emissions. These measures are included in the discussion of GHG emissions as part of Master Response C on page 4-7.

B4-6 For a discussion of mitigation strategies, please see the response to comment #B3-14 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

B4-7 As stated on page 1-7 of the Draft EIR, a separate Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) is being prepared and will be available for public review. In accordance with Federal Aviation Administration (FAA) guidance on the implementation of NEPA, the EA will analyze only the impacts associated with the short-term project elements (i.e., the project elements that the FA is currently considering funding). No long-term project elements will be included in the EA; thus, the more comprehensive analysis of the impacts associated with the Proposede Project occurs in the EIR. In addition, the forecasts required to be used by the FAA result in fewer enplanements and operations than what is included in the Draft EIR. Therefore, the magnitude of the impacts that will be identified in the Draft EA are likely to be less than the magnitude of the impacts identified in the Draft EIR.

In accordance with Section 15088.5 of the California Environmental Quality Act (CEQA) Guidelines, recirculation of the Draft EIR is appropriate when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but before certification has occurred. The CEQA Guidelines provide the following examples of what constitutes "significant new information": (1) a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; (2) a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's

proponents decline to adopt it; and (4) the Draft EIR was so fundamentally and basically inadequate in nature that meaningful public review and comment were precluded. If the County determines that "significant new information" has occurred as part of the CEQA process, then recirculation would occur.

B4-8 Pages 3.10-34 through 3.10-45 of the Draft EIR provide the analysis of noise impacts associated with Proposed Project for the year 2030. The analysis assumed 21 arrivals and 21 departures per day, which is the number of operations already approved by the County of Sonoma General Plan. The Proposed Project does not increase this number.

The Community Noise Equivalent Level (CNEL) is the metric used in the Draft EIR to assess aircraft noise impacts. The State of California, the County of Sonoma, and the Federal Aviation Administration (FAA) specify this methodology for assessing aviation aircraft noise impacts. The CNEL metric is defined in Appendix M, Section 2.4 of the Draft EIR and includes the single event noise of a flyover, the duration of the noise event, and the time of day that the noise event occurs. Therefore, the measures suggested by the commenter for assessing noise impacts are included in the Draft EIR. The Integrated Noise Model (INM), which calculates CNEL, is the preferred tool used to quantify airport noise impacts.

FAA Order 1050-1E, Section 14.1.a states:

> For aviation noise analysis, the FAA has determined that the cumulative noise energy exposure of individuals to noise resulting from aviation activities must be established in terms of yearly day/night average sound level (DNL) as FAA's primary metric. The FAA recognizes CNEL as an alternative metric for California.

FAA Order 5050-4B, Chapter 1, Section 9, Part l.1 footnote 3 states:

> FAA (and other Federal agencies) chose DNL due to its reliable relationship between projected noise exposures and how surveyed communities and people react to noise. In 1992, the Federal Interagency Committee on Noise (FICON) evaluated and reaffirmed the DNL metric as the principal means for describing long-term noise exposure for civilian and military aircraft operations. FICON noted that DNL is the government's primary cumulative noise exposure descriptor because it accounts for all noise events (including aircraft noise) over a period of time.

Sonoma County General Plan, Noise Element, Section 1.1 states:

> In accordance with State law and guidelines, the Noise Element identifies noise sources and sensitive land uses. It quantifies noise levels using noise exposure contours for current and projected conditions within the county. Existing noise levels are measured as Community Noise Equivalent Level (CNEL) or the Day/Night Average Level (Ldn), which are measurements of total noise exposure at a given location for an average day. This noise exposure information serves as a basis for achieving land use compatibility within each community and provides baseline levels and noise source identification for use in a noise control ordinance or during the review of proposed development projects.

B4-9 An airport noise complaint analysis is not required by the CEQA process and would be of limited use in any event. Such a subjective analysis does not comport with CEQA's standards and, as more fully described in the response to comment #B4-8, above, the prescribed methodology for assessing aviation aircraft noise impacts is the CNEL metric employed in the Draft EIR. It is worth noting that noise complaints have been studied and have never been correlated to noise levels or community attitudes about noise levels (see Appendix M of the Draft EIR). Community measurement of long-term noise exposure is measured in terms of annoyance and not complaints. Annoyance and the Community Noise Equivalent Level (CNEL), which was used to identify noise impacts in the Draft EIR, have been correlated and CNEL is a well-accepted method of measuring noise impacts.

B4-10 The CNEL metric calculates average daily aircraft noise exposure. The number of general aviation aircraft operations does not affect the calculated noise impact of larger commercial jets, as CNEL measures the total noise of general aviation and commercial aircraft. Increasing the number of general aviation aircraft would increase the CNEL. Inversely, lowering the number of general aviation aircraft would lower the CNEL.

The commenter is not correct in asserting that including both commercial aircraft and general aviation aircraft does not result in an accurate analysis of noise impacts. Under CEQA, a project's impacts are determined by comparing the noise associated with the Proposed Project against the existing conditions. Thus, even if the number of general aviation operations forecasted in the Draft EIR are "optimistically high" (as suggested by the commenter), such an overestimate would only increase project impacts, not mask them.

As referenced above in the response to comment #B4-8 of this letter, CNEL is the prescribed metric used to assess aircraft noise impacts. CNEL "penalizes" aircraft operating during the evening hours by adding three decibels to each operation that occurs during the period between 7pm and 10pm. In addition, CNEL "penalizes" aircraft operating during the nighttime hours by adding ten decibels to each operation that occurs during the period between 10pm and 7am. Thus, the noise analysis included in the Draft EIR includes these "penalties" for describing the noise impacts associated with the Proposed Project.

Sound exposure levels (SELs) for single-event noise sources were included in Section 3.10 of the Draft EIR. Since no significance thresholds for single events have been established, these SELs were provided for information purposes so that the reader could better understand the noise level associated with a single-event. It is important to note that such an analysis is not required. Thus, any additional single-aircraft noise contours are not required by the CEQA process.

B4-11 The EMB-190 aircraft has runway length requirements greater than the existing length of Runway 14/32 *assuming that the EMB-190 has a full payload of passengers, fuel and baggage*. The EMB-190 could operate on the existing Runway 14/32 length if weight penalties were taken that would result in a less-than-full payload of passengers, fuel, and/or baggage. Therefore, the assumptions used in the noise analysis of the Draft EIR were based on the EMB-190 being operated in a different manner depending on the length of Runway 14/32.

B4-12 This comment does not specifically address the analyses contained in the Draft EIR. The information referred to by the commenter was set forth in a staff report and related PowerPoint presentation, not the Draft EIR, and is associated with single-event noise characteristics of these aircraft. The noise contours presented in the Draft EIR are for all aircraft over a typical 24-hour period. Thus, just because an aircraft has a noise profile of 5 decibels greater compared to another aircraft does not translate into a 5-decibel increase in the CNEL.

B4-13 Contrary to commenter's statements, the Draft EIR noise analysis was modeled with a fleet mix representative of all aircraft types expected to use extended runways that are included as part of the Proposed Project. The fleet mix for existing conditions was formed by collecting FAA radar data, and consulting Airport operators and Airport staff. It is anticipated that these aircraft will continue to use the Airport in the future. Additionally, aircraft that are expected to use the Airport in the future are included in the noise study (see Appendix M, Table 5-3 of the Draft EIR).

B4-14 Appendix M, Table 5-3 of the Draft EIR shows Air Carrier Aircraft, which currently includes only the Q400 aircraft. Other aircraft are included in Appendix M, Table 4-6 of the Draft EIR.

B4-15 The 2008 FAA radar data was used for determining the percent of aircraft operations that occur during nighttime hours because it is the latest year for which that specific data was available.

B4-16 As noted in Chapter 2 of the *Airport Master Plan*, the forecasts were principally derived from the FAA's *Aerospace Forecast* and *Terminal Area Forecast.* Specifically, the passenger load factors and growth rates for non-hub towered airports were used to forecast passenger enplanements. Aircraft operations for scheduled airline service were derived from the enplanement forecast based upon assumptions on the fleet mix. Activity levels for general aviation operations were taken from the *Terminal Area Forecast*. Disaggregation of the general aviation totals was based upon interviews with staff from the FAA Air Traffic Control and fixed base operators at the Airport.

The Airport has contracted with Tri Star Marketing to conduct an independent analysis of airline service potential. The Tri Star study has been updated every other year with the most recent version being prepared in 2011. These studies have consistently indicated that the Airport will see growth in enplaned passengers. These studies also indicate that the Airport could expect to see service to new markets introduced if the runway was long enough to accommodate the types of regional jets the airlines possess. For a more detailed discussion of new airline service, see Master Response A on page 4-2.

Because the forecasts are based upon both national trends identified by the FAA and local market area trends, the forecasts are as reliable and robust as is possible. As the purpose of this EIR is to identify potential impacts (e.g., noise, air quality) associated with the Proposed Project, the use of lower than anticipated activity levels would under estimate impacts. However, because the Airport serves a relatively small market area, it is more likely to see significant year-to-year variations than airports serving larger market areas (e.g., San Francisco International Airport). Although it appears unlikely under current circumstances, it is also possible that there could be a temporary discontinuation

of scheduled passenger service in the future. If that occurs, the impacts related to airline service would be eliminated until scheduled service resumes.

B4-17 Alternative 1, which is described on page 4-8 of the Draft EIR, would result in the use of an alternate airport. This alternative was rejected because it would not meet any of the key project objectives. The forecasts presume that most passengers within the Airport's service area will continue to use one of the major airports (e.g., San Francisco International).

B4-18 The commenter is correct in noting that Alternative 13 would result in the development of a Runway Safety Area (RSA) for Runway 1/19 that meets FAA standards. However, merely shortening Runway 1/19 would not resolve the RSA deficiencies for Runway 14/32. The commenter is incorrect in indicating that a displaced threshold is involved. Alternative 13, as presented, would shorten the runway and would not include a displaced threshold. A variation to Alternative 13 that used a displaced threshold would not fully resolve the decoupling of the two runway ends as recommended by the FAA's Runway Safety Action Team. Please also see Master Response E on page 4-10.

B4-19 As defined, Alternative 13 does not include an extension of Runway 14/32. Therefore, Alternative 13 would not accommodate service using smaller regional jet aircraft, which is a key project objective. Moreover, the commenter does not provide any evidence in stating that "passenger loads must rise about 60% to support 3-5 additional daily flights".

Current passenger load factors to the destinations served by Horizon range from about 65 percent to 94 percent. This is sufficient to justify additional service today by Horizon. However, the proposed extension of Runway 14/32 is not intended to support additional flights to existing destinations by the Q-400 flown by Horizon. The Q-400 does not need an extension of Runway 14/32 to serve other destinations. In fact, it is anticipated that service to San Diego will be initiated within a year. The extension is intended to permit service to new destinations by a different type of aircraft (e.g., regional jets). Today the Airport's catchment area serves about 1.6 million origin/destination passengers each year. Airline service studies conclude that demand exists for regional jet service to new destinations. It is the available runway length that is precluding this service, not the lack of demand. Please also see Master Response E on page 4-10. For a discussion of the demand for airline service within the North Coast region, please see Master Response A on page 4-2.

B4-20 Runway 1/19 is the designated crosswind runway. Runway 1/19 would continue to serve this role for small aircraft under Alternative 13. The reduced runway length would eliminate its use by larger aircraft. However, Runway 1/19 is principally used in combination with Runway 14 to expedite takeoffs. Currently, most departures are made from the north end of the airfield. Air traffic controllers are able to use both Runways 14 and 19 to launch aircraft. This reduces delay in departures.

Shortening Runway 1/19 would mean that aircraft departing on this runway would need to cross Runway 14/32. There would be a strong disincentive for pilots and air traffic controllers to use Runway 1/19 because of the need to cross the stream of landing and departing aircraft using Runway 14/32. It is anticipated that Runway 1/19 would to be used almost exclusively by aircraft based on the west or south side of the airport or by light aircraft when strong winds favor the use of this runway.

Therefore, although landings have priority over departures, landings would be delayed because the queue of aircraft in the landing pattern would be extended. Because essentially all departures with Alternative 13 would occur on Runway 14/32, air traffic controllers would stretch the landing pattern out to permit a departure in between each arrival.

Alternative 13 also would increase the turn-around time for fire attack aircraft. When fighting a fire in western Sonoma County, Cal Fire's fire attack aircraft typically would land on Runway 1 and depart on Runway 19 because it substantially reduces taxiing time. It is anticipated that Cal Fire would no longer use Runway 1/19 because of the inherent delay in having to taxi across Runway 14/32. Please also see Master Response E on page 4-10.

B4-21 For the reasons noted in Master Response E on page 4-10, the Airport would become essentially a one-runway airport if Runway 1/19 is shortened. That is, the majority of aircraft operations would shift to Runway 14/32. This shift in operations would move the noise impacts associated with most operations on Runway 1/19 to flight tracks associated with Runway 14/32. Although the noise contours would not change much because most of the additional operations would be by small, piston aircraft, this increase in operations would extend the noise contours to the northwest and southeast. Although this shift in operations would not create a significant effect, it would result in extended traffic patterns and increased overflights over the Town of Windsor and unincorporated areas south of the Airport by aircraft using Runway 14/32.

B4-22 The commenter states that "[w]e think most of the general aviation fleet . . . can easily use a 4,000 foot runway," but offers no evidence to support this statement. A shortened Runway 1/19 would not be able to accommodate most of the *types* of aircraft that use the Airport. The commenter is correct that the majority (i.e., quantity) of aircraft using the Airport, being single-engine piston aircraft, could use Runway 1/19. However, all aircraft would experience delays with a shortened Runway 1/19 (see also the response to comment #B4-20 of this letter, above).

B4-23 The commenter is not correct in asserting that because the Airport has a control tower that crossing a runway does not present a safety hazard. In fact, the FAA is undertaking a major effort nationally to minimize the need for runway crossings as a means of preventing *runway incursions* (i.e., unauthorized taxiing onto runways). The FAA considers this a very serious issue. The February 2011 Runway Safety Action Plan prepared by the FAA's Runway Safety Action Team (see Appendix F) contained the following recommendation on page 9:

> *Recommend the airport evaluate and consider projects to reduce or eliminate runway back-taxiing and runway crossings.*

The Airport currently has about 80,000 annual operations. While there are certainly periods when the airfield is not busy, there are other periods when there are streams of inbound aircraft on the east and west sides of the Airport, while a queue of aircraft wait for departure.

The commenter suggested that creating a new taxiway around the end of Runway 14 would be a way to eliminate the need for crossing of Runway 14/32. While this is

physically possible, it is impractical because the taxi distance is so long (about 4,200 feet) that it would rarely be used and that there would be major environmental impacts. These impacts would include a need to bridge Airport Creek in two additional places, an additional 4.8 acres of asphalt with associated reduction in tiger salamander habitat and grassland, and the elimination of additional wetland mitigation sites northwest of the runway.

B4-24 It is acknowledged that the following text is shown for deletion in the draft revised ATE in the last paragraph of Section 4.1:

> Analyses of future Airport operations, with and without air carrier operations, indicate that air carrier activity could be accommodated at Charles M. Schulz Sonoma County Airport without unacceptable environmental impacts, provided the type of aircraft and number of aircraft operations are appropriately limited.

This statement in the Air Transportation Element (ATE) was based on a prior environmental document prepared in the 1980s, and a prior Board of Supervisors decision based on that environmental document. This provision and the Board's actions pre-date the federal Airport Noise and Capacity Act of 1990 (ANCA) which severely restricts the ability of airport sponsors to impose noise control restrictions. This project is the subject of a new environmental document. This statement is being eliminated because 1) the number of aircraft operations was already limited in 1988 and the limitation is being kept in place in the revised ATE, so this policy statement is no longer needed, 2) to avoid incurring an ANCA-based objection from FAA that could threaten the entire ATE, and 3) the prior environmental document is being superseded by this Environmental Impact Report. Federal law precludes the County, as an airport sponsor, from imposing additional limitations without complying with ANCA and related federal regulations (14 CFR Part 161). The County does not wish to suggest that further limitations are being imposed.

It should be noted that most of the proposed changes to the ATE are to provide definitions for scheduled airline service that reflect the current types of aircraft used in the airline industry that are anticipated to be feasible for use in providing the numbers of aircraft operations that the ATE currently allows. Policy AT-5b limits the number of scheduled airline services to 21 departures per day and this limit is not changing.

The proposed Airport Master Plan (AMP) provides the following definition for the types of aircraft forecast to use the Airport:

- "Mainline Carrier" is defined as one using jet aircraft with approximately 100 to 150 seats.
- "Regional Carrier" is defined as using turboprop or small jets with 99 seats or less.

The ATE proposes to be revised to be consistent with the above proposed AMP definitions as follows:

- Mainline Carrier: Mainline carriers engage in regularly scheduled air carrier passenger service using jet aircraft with approximately 100 to 150 seats.

- Regional Carrier: Regional carriers engage in regularly scheduled air carrier passenger service between mainly small- and medium-sized communities and the nation's large airports, using turbo-prop aircraft with seating between 10 and 78 seats and small jets with 99 or fewer seats. Commuter carriers engaging in regularly scheduled passenger air carrier service to the public are treated as regional carriers for purposes of applying the scheduled air carrier service departure allocations established in the ATE.

- Commuter Carrier: An air taxi operator which provides service to the general public and performs at least five round trips per week between two or more points and publishes flight schedules which specify the times, days of the week, and places between which such flights are performed. Commuter carriers engaging in regularly scheduled passenger service to the public with aircraft with seating between 10 and 60 seats are treated as regional carriers for purposes of applying the schedule air carrier service departure allocations established in the ATE.

These definitions correspond to current trends in the aviation industry. The US commercial aviation industry consists of 16 "mainline" air carriers that operate larger passenger jets with more than 100 seats and are typically associated with a "hub and spoke" pattern of service. These larger aircraft are designed for longer flights. With regard to "regional" air carriers, there are currently more than 30 in the US. Regional airlines operate smaller piston, turboprop, and regional jet aircraft of up to 99 seats and are often associated with specific short-haul (typically 3 hours or less) flights most often to the nation's hub airports.

The 1998 Airport Master Plan was silent with regard to definitions for scheduled commercial airline service and the types of aircraft used.

The existing ATE, created in the mid-1980s, used the terms "commuter" and "scheduled" for regularly scheduled commercial airline services. The existing ATE contains the following definitions for the type of airlines envisioned to provide airline services in accordance with the 21 per day departure allocation policy AT-5b:

> Commuter Airline: Commuter airlines engage in regularly scheduled air service, carrying persons or property on intrastate routes.
>
> Scheduled Airlines: Scheduled airlines engage in regularly scheduled air passenger service, and operate on intrastate and interstate routes.

The existing ATE projections and aircraft types were based on air carrier industry assumptions used from the 1980s that have not been valid for many years. These old assumptions underlying regularly scheduled "commuter" service being restricted to intrastate routes would not meet the Airport Master Plan Update project objectives of providing up to 21 scheduled airline service departures per day. For example, while there currently is a market for flights to Los Angeles, there is not a demand for regularly scheduled market rate air carrier service to Bay Area airports, at prices that would be required to make these connecting flights feasible for air carrier service providers. In the 1980s, a subsidized commuter air carrier service was provided by a major airline which brought passengers from Santa Rosa to its connecting mainline flights at San Francisco

International Airport. The major airline terminated its subsidy to the contractor providing commuter air carrier service in the early 1990s and passenger levels dropped significantly, and ended completely in 2001. After 2001, there had not been any scheduled air carrier service for six years at the Airport until Horizon initiated service in 2007. Continuation of reliance on old air carrier industry assumptions also is an obstacle to the feasibility of providing the 21 scheduled airline service departures that the General Plan allows. The ATE's 21 scheduled airline service departures per day limit has been in effect for over twenty years and is not proposed for change.

B4-25 Presently, there is no designated air cargo handling facility at the Airport, although portions of Aprons D and E are used by FedEx and UPS for small package shipments. These two carriers average a total of 67 landings per month, bringing in an average of 14,000 pounds of cargo per month. Outbound cargo averages over 98,000 pounds per month. It is anticipated that air cargo volume will increase in the future. However, it is not anticipated that aircraft operations would increase significantly, because the air carriers would have the option to utilize larger aircraft. Such aircraft could include medium sized twin engine turboprops with maximum take off weights in the 42,000 to 48,000 pound range. The Airport Master Plan Update notes that cargo carriers should have their own consolidated operations area. Currently cargo is moved directly from the trucks to the aircraft in the open. Changes in security requirements for cargo operations by the Transportation Security Agency could also necessitate creation of a dedicated cargo building for screening. An area in the vicinity of Apron F has been identified as a potential site for this purpose. However, these plans are only conceptual at this time, and the precise scope, design, and location has yet to be determined. In the future when air cargo operators indicate a desire to introduce larger cargo aircraft at the Airport, further study will occur to determine the best location/size for such consolidated air cargo operations area and to further assess impacts and consistency with policies of the ATE, and a subsequent project-level environmental review will be conducted for the air cargo facility proposal to address site-specific concerns. For a more in-depth discussion of the tiered environmental review for long-term project elements, please see Master Response F on page 4-17.

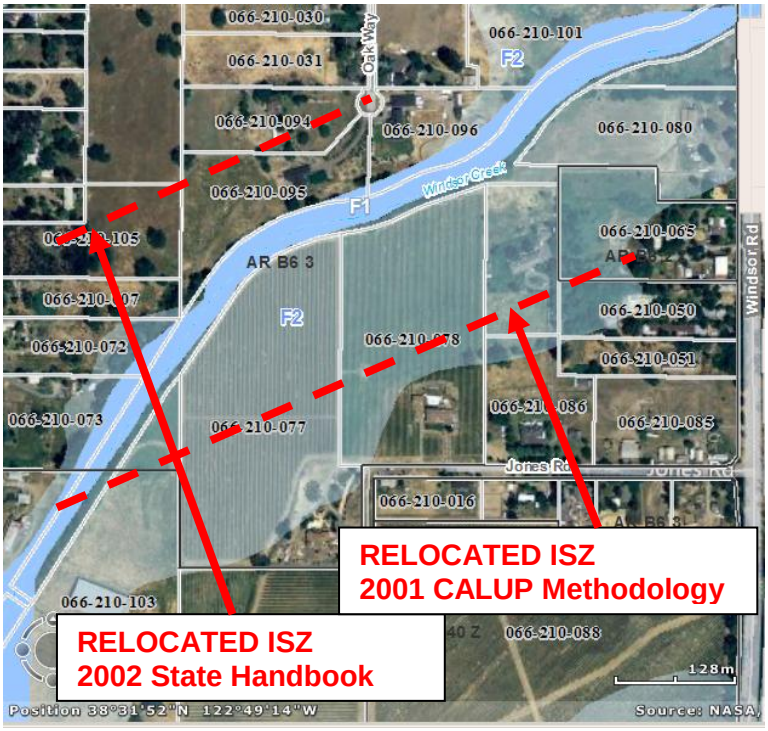
The following policy was added to the revised ATE to clarify and ensure that all air cargo freight commercial services are subject to the same license, lease or operating agreement requirements that schedule airline service is subject to (Policy AT-5d). This policy ensures that air cargo freight service is subject to the noise limitations of the ATE and other policies of the General Plan.

> Policy AT-4e: Any dedicated commercial cargo freight service provider at the Charles M. Schulz – Sonoma County Airport initiating or expanding service at the Airport shall be required to enter into a license, lease or operating agreement with the County of Sonoma. Licenses, leases and operation agreements shall implement and be required to conform to the policy directives of the General Plan.

B4-26 The Draft EIR found that the proposed changes to the Comprehensive Airport Land Use Plan (CALUP) Safety Zones for the Airport would result in two parcels in the unincorporated Sonoma County area north of the Airport being placed into more restrictive safety zones that would reduce residential subdivision potential. It should be noted that the majority of these two parcels already are limited in development potential because of their location within the –F1 (Floodway) and –F2 (Floodplain) zoning districts.

General Plan Objective LU-7.1 states: "Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability." These two parcels are both developed with vineyards and homes as shown in **Figure B4-26-1**.

Figure B4-26-1
AERIAL PHOTO WITH –F1 AND –F2 ZONING SHOWING RELOCATED SAFETY ZONES



SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

No other reductions in residential land use density were identified associated with safety zone relocations for one of the following reasons:

1) The General Plan land use designations are consistent with the CALUP and Handbook density criteria; or
2) Although the General Plan land use designations exceed the CALUP and Handbook density criteria, the properties are developed to their maximum densities. Therefore, in accordance with California Public Utilities Code Section 21674(a), the ALUC has no authority over these existing land uses.

The following land use map density alternatives exist for achieving consistency with potential future CALUP density restrictions and the Sonoma County General Plan land use map for the two parcels identified (APN 066-210-077 and APN 066-210-078) identified:

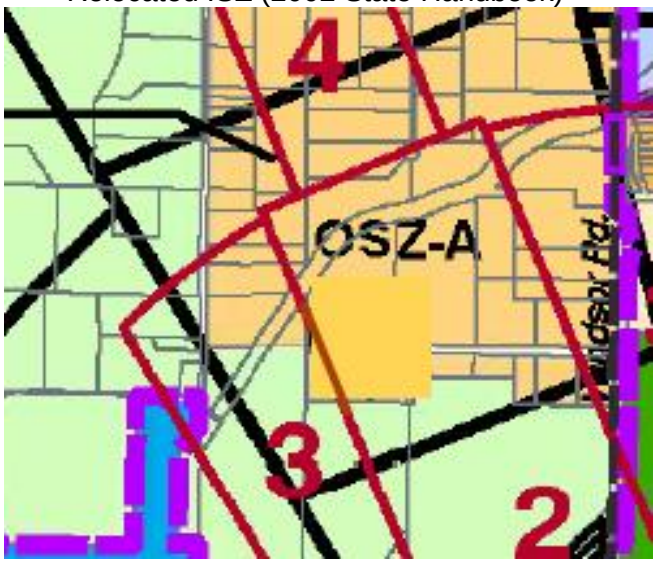
1. **Relocated Safety Zones Based on 2002 CA Airport Land Use Planning Handbook.** If the ALUC bases the relocated safety zones on the more current 2002 California Airport Land Use Planning Handbook (see **Figure B4-26-2**), these two parcels in their entirety would be redesignated to a 10-acre per unit density and because they each contain one residential unit, would not have additional subdivision or primary residential unit development potential. This is identified as Mitigation Measure 3.9.2 on pages 3.9-11 and 3.9-12 of the Draft EIR.

Figure B4-26-2
RELOCATED INNER SAFETYZONE (ISZ)

Relocated ISZ (2001 CALUP Methodology)



Relocated ISZ (2002 State Handbook)



SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

Table 3.9-1 on page 3.9-10 of the Draft EIR identifies the number of acres of land associated with APN 066-210-077 and 066-210-078 that would be within a relocated Handbook safety zone and the applicable criteria for each zone. As noted above, significant portions of these two parcels are constrained by the –F1 (Floodway) and –F2 (Floodplain) zoning designations. As such, the buildable portions of APN 066-210-077 and 066-210-078 fall entirely within Safety Zone 2 as indicated in **Figures B4-26-3** and **B4-26-4**. For this reason, and for the purposes of the Sonoma County General Plan, it is assumed that all of the land associated with APN 066-210-077 and 066-210-078 would be within the relocated Safety Zone 2. The density restrictions for these two parcels would be as indicated in **Table B4-26-1**. Again, **Table B4-26-1** represents a more conservative approach than reflected in Table 3.9-1 on page 3.9-10 of the Draft EIR.

Table B4-26-1
DENSITY RESTRICTIONS FOR APN 066-210-077 AND APN 066-210-078

Handbook Safety Zone	Handbook Allowable Residential Density	APN 066-210-077 Acreage in Handbook Zone	APN 066-210-077 Units allowed under Handbook Criteria	APN 066-210-078 Acreage in Handbook Zone	APN 066-210-077 Units Allowed under Handbook Criteria
1-Runway Protection	0				
2-Inner Approach /Departure	1 du/10-20 acres	13.6 (all)	1	10.24 (all)	1
3-Inner Turning	1 du/2-5 acres				
4-Outer Approach/ Departure	1 du/2-5 acres				
5-Sideline	1 du/1-2 Acres				
6-Traffic Pattern	No limit				

SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

2. Relocated Safety Zones Based on 2001 CALUP Methodology. This scenario is based on using similar methodology as used for the 2001 CALUP (see **Figure B4-26-2**). Alternative A reflects an amendment of the land use map associated with the relocated Safety Zone boundary. Alternative B relates to a clustered pattern of future development and is added to Mitigation Measure 3.9.2 as an alternative equivalent mitigation that could be used that would not require General Plan Amendment.

A. Amend Figure LU-2c, Land Use Map, to change allowable density on the portions of APN 066-210-077 (13.6 acres total) and APN 066-210-078 (10.24 acres total) within the new more restrictive Inner Safety Zone (ISZ) to one dwelling unit per five acres, from the current three acre density. The ISZ CALUP residential density is 0.2 units per acre (5 acres per unit) based on using the existing methodology for safety zone calculations of the 2001 CALUP. This would create parcels with split General Plan designations if the ALUC based revised safety zones in a similar manner as was used with the adoption of the 2001 CALUP. Table **B4-26-2** indicates the existing and future development potential associated with this approach.

Table B4-26-2
ALTERNATIVE A APPROACH FOR FUTURE DEVELOPMENT POENTIAL OF APN 066-210-077 AND APN 066-210-078

2001 CALUP Safety Zone	2001 CALUP Allowable Residential Density	APN 066-210-077 Acreage in Relocated CALUP Zone	APN 066-210-077 Units allowed under CALUP Criteria (or General Plan Density if more restrictive)	APN 066-210-078 Acreage in Relocated CALUP Zone	APN 066-210-077 Units Allowed under CALUP Criteria (or General Plan Density if more restrictive)
RPZ-Runway Protection	0				
ISZ-Inner Safety	1 du/5 acres	4	1 (existing home in the ISZ)	3.6	1 (existing home in the ISZ)
ITZ-Inner Turning	1 du/5 acres				
OSZ-Outer Safety	SonCo: 4 units/acre All other airports: 3 du/acre	9.6	3 (new on a total of 9.6 acres at the GP density of 1 du/3 acres)	6.6	2 (new on a total of 6.6 acres at the GP density of 1 du/3 acres)
SSZ-Sideline Safety	1 du/1 acre				
TPZ-Traffic Pattern	SonCo: 5 units/acre All other airports: 4 du/acre				
	Total		**4**		**3**

SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

B. Another alternative is available that would not require an amendment of the General Plan land use map, but would require that these two parcels develop only with a clustered subdivision approach, which creates lots of minimum 5 acre size within the ISZ, and clusters any new residential units to the north in the less restrictive OSZ. This is possible under the current General Plan designation of Rural Residential and Zoning of Agriculture and Residential, which allows lots as small as 1.5 acres, provided that if

> any lots remain with subdivision potential (i.e. for a three acre density, any lots that are 6 acres or more) are rezoned to the –B7 Combining District to signify that the larger parcels are prevented from further subdivision after approval of a clustered subdivision (Sonoma County Code Section 26-78-010). The CALUP (page 8-25) specifically allows this type of density transfer. A General Plan Amendment at this time would not be necessary with this approach. In conjunction with any future subdivision proposal on these two parcels, the environmental suitability of allowing additional density on these parcels would be evaluated, and if it was determined that the parcels were appropriate for additional density, a condition would be placed on the subdivision requiring clustering and rezoning of the larger parcel to a –B7 (frozen lot size) zoning district. It is not known if APN 066-210-077 and APN 066-210- 078 have the ability to provide septic systems for additional units, because of potential flooding and septic system requirements. The maximum number of potential primary residential units (assuming there are no constraints associated with the flooding on the property) are indicated in **Table B4-26-3**.

The relocated CALUP Safety Zones north of the Airport and for the larger area surrounding the Airport are shown below in **Figures B4-26-3** and **B4-26-4**. The relocated zones are shown in red. Existing CALUP safety zones are shown in black. Existing Windsor and Sonoma County General Plan land use designations are also indicated in the map legend. Following these graphics, **Table B4-26-4** summarizes the current safety zone land use and building restrictions of the CALUP.

The Comprehensive Airport Land Use Plan, 2001, contains the following land use compatibility standards for Airport Safety Zones. As can be seen from **Table B4-26-4**, the Inner Turning Zone (ITZ) calls for a maximum residential density of five acres per dwelling unit. The next least restrictive safety zone, the Outer Safety Zone, allows four dwelling units per acre.

It is also noted that with respect to heights of buildings, the CALUP (page 8-16) states:

> An object which would be located within a horizontal or conical zone as defined in FA.R. Part 77, Subpart C, and would be 35 feet or less in height above the ground (i.e., is within the height limits prescribed for most Sonoma County land use zoning classifications) shall be considered conditionally acceptable even if it exceeds the prescribed height limit. Marking and lighting may be conditions for acceptability.

The commenter's request for a moratorium under the flight path would be more restrictive than the CALUP requires and is prohibited by law.

Table B4-26-3

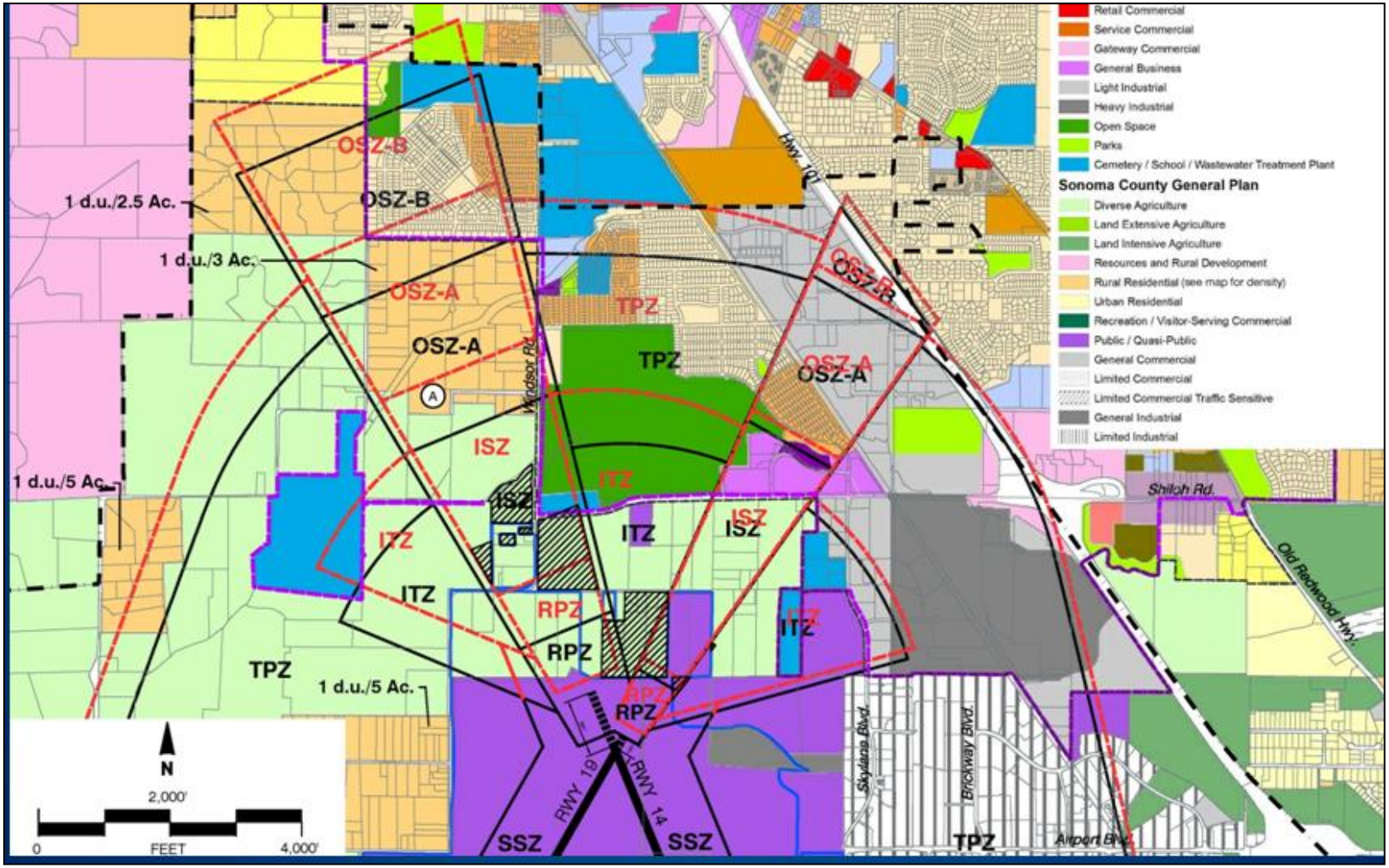
ALTERNATIVE B APPROACH FOR FUTURE DEVELOPMENT POENTIAL OF APN 066-210-077 AND APN 066-210-078

2001 CALUP Safety Zone	2001 CALUP Allowable Residential Density	APN 066-210-077 Acreage in Relocated CALUP Zone	APN 066-210-077 Units allowed under CALUP Criteria (or General Plan Density if more restrictive)	APN 066-210-078 Acreage in Relocated CALUP Zone	APN 066-210-077 Units Allowed under CALUP Criteria (or General Plan Density if more restrictive)
RPZ-Runway Protection	0				
ISZ-Inner Safety	1 du/5 acres	4	1 (existing home in the ISZ)	3.6	1 (existing home in the ISZ)
ITZ-Inner Turning	1 du/5 acres				
OSZ-Outer Safety	SonCo: 4 units/acre All other airports: 3 du/acre	9.6	3 (clustered in the OSZ at a GP density of 1 du/3 acres)	6.6	2 (clustered in the OSZ at a GP density of 1 du/3 acres)
SSZ-Sideline Safety	1 du/1 acre				
TPZ-Traffic Pattern	SonCo: 5 units/acre All other airports: 4 du/acre				
	Total		4		3

SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

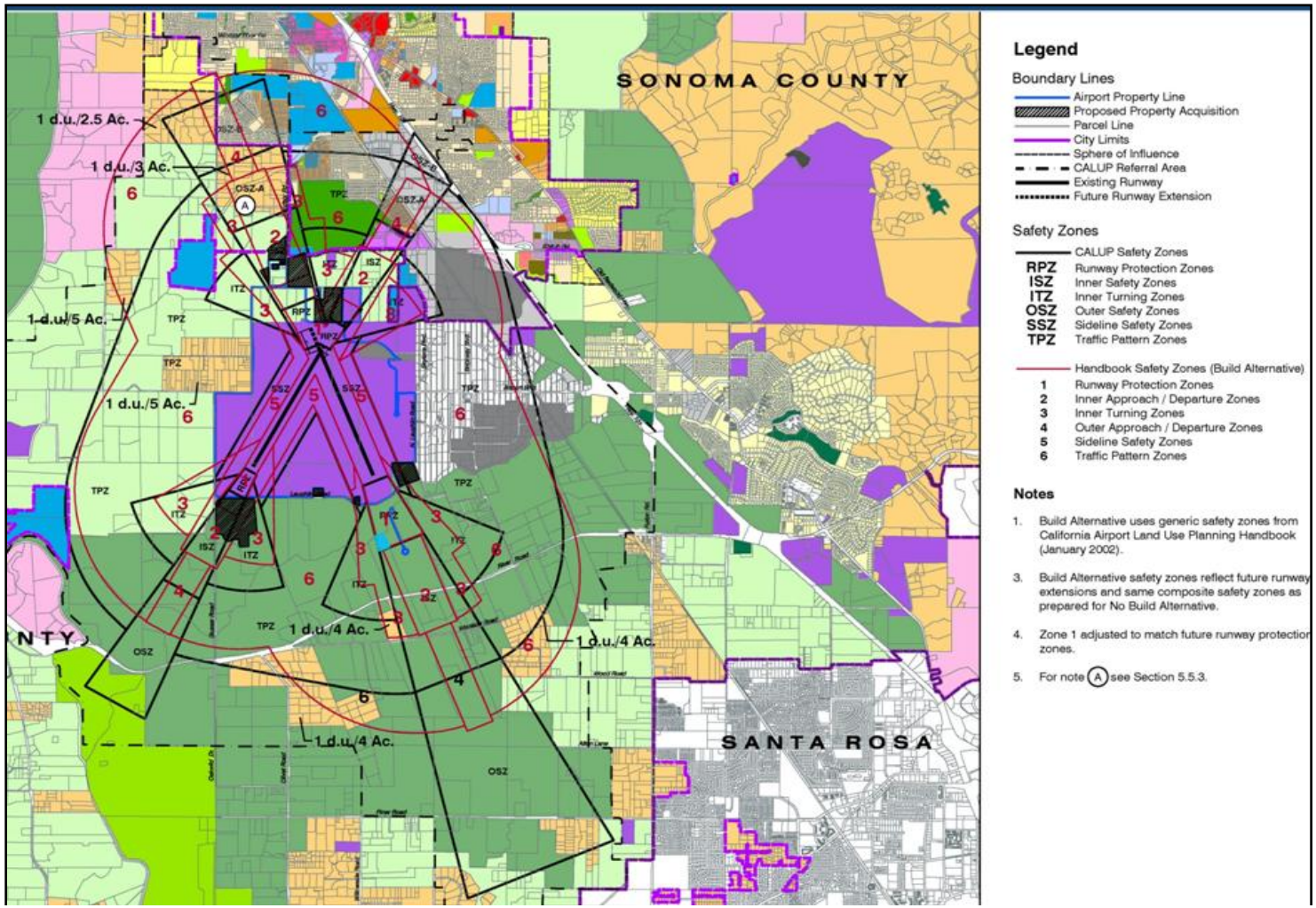
Figure B4-26-2

RELOCATED AND SAFETY ZONES/GENERAL PLAN LAND USE CATEGORIES



SOURCE: County of Sonoma , 2011
PREPARED BY: Mead & Hunt, 2011

Figure B4-26-3
SAFETY ZONE COMPARISON



SOURCE: County of Sonoma , 2011
PREPARED BY: Mead & Hunt, 2011

Table B4-26-4

SONOMA COUNTY CALUP TABLE 8B SUMMARY
LAND USE COMPATIBILITY STANDARDS FOR AIRPORT SAFETY ZONES[56]

Safety Zone	Maximum Population Density /a/	Maximum Residential Density in Units/Acre /b/	Minimum Amount of Usable Open Space	Land Use /c/
RPZ - Runway Protection Zone	0 /d/	0 /d/	90 percent of gross area	No petroleum or explosives. No above-grade power lines. No significant obstructions. /e/
ISZ - Inner Safety Zone	A. Uses in structures: 40 persons/acre. /f/ B. Uses in structures +4,700' north of Runway 1/19 at Sonoma County Airport: 60 persons per acre. C. Uses not in structures: 80 persons per acre.	0.2 dwelling unit per acre	30 percent of gross area 25 percent maximum structural coverage	No shopping centers. No eating establishments. No meeting halls. No office buildings over three stories. No labor-intensive manufacturing plants. No concert halls, theaters, or auditoriums. No stadiums, arenas. No public utility stations or plants. No public communications facilities. No schools, hospitals, or nursing homes. No uses involving, as the primary activity, manufacture, storage, or distribution of explosives or flammable materials. /g/
ITZ - Inner Turning Zone	A. Uses in structures: 50 persons per acre. B. Uses not in structures: 100 persons per acre	Same as ISZ	20 percent of gross area 30 percent maximum structural coverage	Same as ISZ.
OSZ -Outer Safety Zone	A. Uses in structures: 100 persons per acre. B. Uses not in structures: 200 persons per acre	A. In outer sub-zones north of Sonoma County Airport: 4 units per acre. B. In all other OSZs: 3 units per acre.	30 percent of gross area 35 percent maximum structural coverage	No schools, hospitals, or nursing homes. No uses involving, as primary activity, manufacture, storage, or distribution of explosives or flammable materials.

[56] Sonoma County Permit and Resource Management Department, *Comprehensive Airport Land Use Plan for Sonoma County (CALUP)*, available at: http://www.sonoma-county.org/prmd/docs/airport/ch8-excerpt.htm#8b. Accessed October 17, 2011.

Table B4-26-4 (cont.)
SONOMA COUNTY CALUP TABLE 8B SUMMARY
LAND USE COMPATIBILITY STANDARDS FOR AIRPORT SAFETY ZONES[57]

SSZ - Sideline Safety Zone	A. Uses in structures: 60 persons per acre. B. Uses not in structures: 120 persons per acre	1.0 dwelling unit per acre	30 percent of gross area 35 percent maximum structural coverage	No schools, hospitals, or nursing homes. No uses involving, as the primary activity, manufacture, storage, or distribution of explosives or flammable materials.
TPZ - Traffic Pattern Zone	Uses in structures: 150 persons per acre	A. At Sonoma County Airport: 5 units per acre. B. In all other TPZs: 4 units per acre.	15 percent of gross area	Discourage schools, auditoriums, stadiums, or amphitheaters. /h/ Discourage uses involving, as the primary activity, manufacture, storage, or distribution of explosives or flammable materials.

/a/ See CALUP Subsection 8.4.1.b for an explanation of the methodology for determining population density for any proposed use.

/b/ Granny units (second dwelling units) are not restricted by this plan if such units are permitted under a local jurisdiction's zoning code.

/c/ The following uses shall be prohibited in all airport safety zones:

(a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA approved navigational signal light or visual approach slope indicator.

(b) Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff engaged in a straight final approach toward a landing at an airport.

(c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. Large water features, including, but not limited to, wetlands, and water storage ponds that could attract birds are generally prohibited, provided, however, that ponds which are designed so as not to attract birds (e.g., ponds devoid of shrubs and trees or similar habitat for birds) would be permitted. Food and fiber processing activities involving outdoor storage of food products and seeds which would attract birds would be prohibited. This prohibition would not apply to the cultivation of land, including orchards, vineyards, horticulture, or crop raising.

(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

/d/ No structures permitted in RPZ.

/e/ Significant obstructions include, but are not limited to, large trees, heavy fences and walls, tall and steep berms and retaining walls, non-frangible street light and sign standards, billboards.

/f/ "structure" includes fully enclosed buildings and other facilities involving fixed seating and enclosures limiting the mobility of people, such as sports stadiums, outdoor arenas, and amphitheaters.

/g/ This does not apply to service stations involving retail sale of motor vehicle fuel if fuel storage tanks are installed underground.

/h/ See CALUP Subsection 8.6.5 in text.

SOURCE: County of Sonoma , 2011
PREPARED BY: County of Sonoma, 2011

[57] Sonoma County Permit and Resource Management Department, *Comprehensive Airport Land Use Plan for Sonoma County (CALUP)*, available at: http://www.sonoma-county.org/prmd/docs/airport/ch8-excerpt.htm#8b. Accessed October 17, 2011.

B4-27 The list of persons and agencies consulted, which is presented in Chapter 7 of the Draft EIR, contains primarily federal, state, and local agency staff, and other public or private entity personnel who were consulted during production of the Draft EIR to obtain information needed for various environmental analyses contained in the document (for example, several local jurisdictions were consulted to obtain lists of current development projects for use in cumulative impact analyses).

A few of the entities listed provided input on the project through various stakeholder and other public agencies. Three groups of stakeholders were identified: elected officials from nearby jurisdictions, local environmental organizations, and business and tourism groups. Rodney Strong Vineyards was not identified as a stakeholder, nor did they identify themselves as an interested party.

The location of the Rodney Strong Vineyards facility is about 3.5 miles north of the Airport. It is not located within any Community Noise Equivalent Level (CNEL) noise contour for either 2015 or 2030 (see Figures 3.10-4 and 3.10-10 on pages 3.10-21 and 3.10-37 of the Draft EIR, respectively) or within any single event Sound Exposure Level (SEL) contour (see Figures 3.10-16 through 3.10-25 on pages 3.10-47 through 3.10-56 of the Draft EIR). The SEL contour for the MU3001 (see Figure 3.10-20 on page 3.10-51 of the Draft EIR) comes closest to the facility but still falls short. In addition, the facility is located north of areas where flight tracks are expected to change (see Figures 4-2a and 4.2b in Appendix M of the Draft EIR). Like any other member of the public, Rodney Strong Vineyards may submit comments on the Draft EIR and the project.

B4-28 The commenter references Table 2-9, which does not exist in the Draft EIR. However, it could be reasonably inferred that the Commenter is referring to Table 2-4 on page 2-9 of the Draft EIR. With this assumption, if the plan is not successful then the long-term project elements would not move forward and the associated funding would not be necessary. If the Airport is successful in achieving the long-term project elements identified in Table 2-4 on page 2-9 of the Draft EIR, funding would come from a variety of sources, including FAA Airport Improvement Grants, Federal Earmarks, Passenger Facility Charges, general Airport operating revenues and loans. Each project uses different funding sources differently and each project is evaluated for the appropriate mix of funding sources. It is important to note that these various funding sources can only be used to fund improvements at the Airport and cannot be used for other purposes (such as road repair).

COMMENT LETTER B5 – LETTER SUBMITTED BY CALIFORNIA NATIVE PLANT SOCIETY MILO BAKER CHAPTER
Page 1 of 5



California Native Plant Society
Milo Baker Chapter

September 19, 2011

To: Crystal Acker
County of Sonoma Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
Email: crystal.acker@sonoma-county.org

Subject: Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project dEIR, Milo Baker Chapter, CNPS comments

Dear Ms Acker-

On behalf of the Milo Baker [Sonoma County] Chapter of the California Native Plant Society, thank you for the opportunity to comment on the Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project draft Environmental Impact Report (dEIR).

Thank you for your assistance throughout the dEIR process, outlining the review schedule during the scoping period and making sure that the exhibits were complete when uploaded to the Airport website.

We appreciate the diligence of LSA staff in reporting plant occurrences to the California Natural Diversity Data Base and to CalFlora. Timely reporting to these data sources increases our knowledge of Sonoma County's flora and plant habitats.

1 The Milo Baker Chapter agrees with the concerns raised in the Sonoma County Water Coalition's (SCWC) dEIR comments letter and supports SCWC's recommendations. The Milo Baker Chapter is willing to assist, in its appropriate capacity, in the implementation of the SCWC recommendations. SCWC recommendations are not repeated in this comment letter, for brevity's sake.

2 The 7.2 acres of anticipated wetland impacts resulting from the proposed Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project (project), is a significant loss to the remaining Windsor-area wetlands. As a public agency project, mitigation decisions should consider diverse public policy objectives over the most convenient option for the applicant. The Charles M. Schultz-Sonoma County Airport (Airport) has a questionable environmental stewardship record; project selection and mitigation decisions will reflect upon the Airport management and the Board of Supervisors.

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Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project dEIR, Milo Baker Chapter, CNPS comments- page 2

- ✓ The Milo Baker Chapter recommends that Windsor area projects-related wetland impacts be mitigated in the Windsor area.

2

The Milo Baker Chapter is concerned with three dEIR issues:

- Impacts to occupied Burke's goldfields habitat resulting from project elements 2A3, 2A4 and 2A5
- Impacts to locally rare and disjunct plant populations
- Conflicts with Approved Conservation Plans- "Windsor Plant Conservation Area"

Impacts to occupied Burke's goldfields habitat resulting from project elements 2A3, 2A4 and 2A5

We do not agree with the Impact 3.4.15 finding (dEIR page 3.4-51) that the

> "*Implementation of the long-term project elements, as currently described in the Master Plan, would not affect any existing populations of these federal and state-listed Endangered species, nor would it affect any wetlands where these species have historically occurred*"

3

dEIR Figure 3.4-4, *Occurrences of Special Status Species in the Airport Study Area*, shows that both historic and current (LSA 2003-2010) Burke's goldfields subpopulations occur where proposed project elements 2A3, 2A4 and 2A5 are sited. The extent of the Runway 14-32 Preserve in the dEIR exhibits is not consistent with the "Environmental Mitigation Preserve" boundary outlined in the Airport Master Plan Figure 3B, *Existing Airport Land Use* or in the Airport Master Plan Figure 3I, *Future Airport Land Use*. Both Airport Master Plan land use figures designate the length of Runway 14-32 as "Natural Resource Preservation Area". The Runway 14-32 Preserve shown in the dEIR exhibits does not encompass the current extent of the Burke's goldfields subpopulation.

- ✓ The Milo Baker Chapter recommends that the extent of the Runway 14-32 Preserve and related Preserve agreements be modified to encompass the entire Runway 14-32 Burke's goldfields subpopulation, including the plants found on the east side of Taxiway Y(ankee) and other outliers.

The September 2008 U.S. Fish and Wildlife Service Sonoma Sunshine, Burke's Goldfields and Sebastopol Meadowfoam 5-Year Review: Summary and Evaluation states on page 6 under Updated Information and Current Species Status, for Burke's Goldfields:

> "*The data indicate large populations of L. burkei are diminishing and nearly half of the sites may have populations either extirpated or are highly vulnerable to extirpation due to small population numbers (less than 10 individuals)…*"

CNPS, Milo Baker Chapter, P.O. Box 892, Santa Rosa, CA 95402

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Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project dEIR, Milo Baker Chapter, CNPS comments- page 3

We concur with SCWC concern IV regarding these project elements.

3 ✓ The Milo Baker Chapter recommends that impacts resulting from project elements 2A3, 2A4 and 2A5 be addressed in the dEIR. The current dEIR process could be used to establish acceptable development principles and mitigation standards. The principles and standards established could be applied to the long term project elements when those project proposals are introduced.

Impacts to locally rare and disjunct plant populations

Appendix C, *Plant Species Observed within the Sonoma County Airport Botanical Surveys 2003-2004 2009-2010* labeled as Appendix E, *Observed Plant Species*, within Appendix H, *Biotic Resources*, (Appendix C) identifies three plant species that can be considered either as rare, or as previously unreported in Sonoma County but common in other regions of California, or as known from limited reported Sonoma County occurrences (see attachment 1).

Centromadia parryi var parryi (pappose tarplant)
Hesperevax caulescens var hesperevax (Hogwallow starfish)
Holocarpha heermannii (Heerman's tarweed)

A fourth species is tentatively identified as "*Hemizonia sp.*"

4 The dEIR describes impacts and proposed mitigation for pappose tarplant, but it does not acknowledge the possible significance of the above three plants occurring in the Airport Study Area. "Hemizonia sp." is too vague to contemplate its significance. The dEIR does not provide location information, making it impossible for the reviewer to evaluate the project impact on these locally rare or disjunct populations.

The significance of locally rare or disjunct populations is discussed in Leppig and White[1]:

> '*Yet, to our knowledge, CEQA rarely has been utilized to protect peripheral or otherwise locally significant populations of widespread plant species if the species could not be considered endangered, rare or threatened pursuant to CEQA (section 15380[d]). Despite this, a fair argument can be made by public agencies and conservationists that potentially significant impacts to these populations must be disclosed and avoided if: 1) the population is locally rare or unique to CEQA section 15125[c]) and therefore may have intraspecific variation and potential evolutionary significance; 2) the population has regionally significant ecological importance; and 3) the population has local cultural, economic or historic value.*'*

*CEQA Section 15125. Environmental Setting.
(c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

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4

- ✓ The Milo Baker Chapter requests additional information (location, number of plants, site conditions, confidence in taxa identification, etc) about these plant occurrences in order to adequately evaluate proposed project impacts and mitigation measures.

Conflicts with Approved Conservation Plans- "Windsor Plant Conservation Area"

The discussion regarding conflicts with approved conservation plans on dEIR page 3.4-45 is incomplete. The dEIR states:

> *"The Airport previously established and placed under permanent protection and management three preserves, encompassing approximately 41 acres, within which Burke's goldfields populations occur: (1) the Goldfields Preserve, (2) the Runway 14-32 Preserve and (3) the SACMA Preserve* (see **Figure 3.4-4**)."

Conservation Strategy Section 4.4.1 Existing Preserves (page 17) states:

> *"Banks and individual mitigation sites must be protected in perpetuity, have a long-term management plan and an endowment for its implementation, and security for the performance of any required remediation"*

- ✓ Are monitoring records available for these (and the other) Airport preserves?
- ✓ Has each preserve met its agency-prescribed biological performance goals?
- ✓ Is a perpetual, non-wasting management endowment in place for each preserve?
- ✓ Has the management endowment obligation been paid?

5

The significance of the Airport Burke's goldfields subpopulations was recognized by Pavlik[2]. Though population size, distribution and quality may have changed during the intervening years, Pavlik's observations remain relevant:

> *"Given the large number of robust, separate, and introduced subpopulations of Lasthenia burkei, the Sonoma County Airport would be a favorable site for experimental, small-scale manipulations. The effects of fire, weeding, herbicides, and mowing (timing, techniques) on the demography of Lasthenia burkei could be done without disrupting airport operations or putting natural populations at risk. There would be access and public relations issues related to obtaining cooperation from airport administrators."*

We believe that the Conservation Strategy's Biological Objectives for the Windsor Plant Conservation Area expects a more active approach for the preservation of the many-flowered Navarretia in the Airport Study Area vicinity than the avoidance cited in the dEIR. The dEIR omitted the introductory sentence in its discussion of the objectives for the Windsor Plant Conservation Area:

> *2) Establish listed plant preserves to maintain genetic diversity of the listed plants throughout their known range on the Plain:"*

CNPS, Milo Baker Chapter, P.O. Box 892, Santa Rosa, CA 95402

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The January 2009 *U.S. Fish and Wildlife Service many-flowered Navarretia 5-Year Review: Summary and Evaluation* states on page 6 under Habitat Protection:

> ***1B, Species localities distributed across the species geographic range and genetic range are protected. Protection of extreme edges of populations protects the genetic differences that occur there.***
>
> *Navarretia leucocephala ssp plieantha has been known historically and currently to occur only in Sonoma and Lake Counties. This criterion has not been met because the southern most occurrences in Sonoma County have not yet been protected.*

5

Windsor represents the northern limit of extant Santa Rosa Plain Burke's goldfields occurrences. The Airport-area occurrence of the many-flowered Navarretia is the sole occurrence on the Santa Rosa Plain and one of seven remaining occurrences in the world. Mitigation funds accruing from the proposed Charles M. Schultz-Sonoma County Airport Master Plan Implementation Project should be directed toward purchasing Windsor-area parcels occupied by Burke's goldfields or the many-flowered Navarretia.

Please contact me if you have questions about these comments and please notify the Milo Baker Chapter of future dEIR comment opportunities.

Sincerely

John Herrick
Ex-Conservation Chairperson
Milo Baker Chapter, California Native Plant Society

% Milo Baker CNPS
PO Box 892
Santa Rosa, CA 95402

cc: California Department of Fish and Game
North Coast Regional Water Quality Control Board
US Army Corps of Engineers
US Fish and Wildlife Service

[1] Leppig, G and White, J. 2006. Conservation of Peripheral Plant Populations in California. Madrono 53:264-274

[2] Pavlik, B., Smith, A, and Miller, A. 1998. Development of the Santa Rosa Vernal Reserve System. 1. Property Inventory, Database Construction and Short-term Management Regimes for Ecological Restoration. CA Department of Fish and Game

CNPS, Milo Baker Chapter, P.O. Box 892, Santa Rosa, CA 95402

RESPONSES TO COMMENT LETTER B5 – LETTER SUBMITTED BY CALIFORNIA NATIVE PLANT SOCIETY MILO BAKER CHAPTER

B5-1 See the responses to comments #B3-1 through #B3-14 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) starting on page 5-72.

B5-2 Under the Draft EIR mitigation measures, there would be no net loss of wetlands. All 7.2 acres of wetland impacts would be replaced with new wetlands on a minimum 1:1 basis. The wetland impacts associated with the Proposed Project do not reflect the most convenient option for the Airport but, rather, reflect the only option that would accomplish project objectives in accordance with Congressionally-mandated FAA safety requirements and other FAA safety guidelines. The wetland impacts also reflect the results of a design effort that sought to avoid and minimize impacts to wetlands and other sensitive resources to the maximum extent feasible.

For a discussion of the limitations imposed on the management of biological resources onsite at the Airport, please see Master Response B on page 4-4.

With regard to the recommendation that wetland mitigation be conducted in the Windsor area, please see the response to comment #B3-14 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

With regard to the comment on potential impacts to Burke's goldfields from long-term project elements 2A3, 2A4 and 2A5, please see the response to comment #B3-13 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

With regard to the concern about impacts to locally rare and disjunct plant populations, please the response to comment #B5-4 of this letter on page 5-104.

With regard to the comment regarding potential conflicts with approved conservation plans within the Conservation Strategy's Windsor Plant Conservation Area, please see the response to comment #B5-5 of this letter on page 5-104.

B5-3 With regard to the comment on potential impacts to Burke's goldfields from long-term elements 2A3, 2A4 and 2A5, please see the response to comment #B3-13 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

With regard to the comment on the boundaries of the Runway 14/32 Preserve, the boundaries shown on Airport Master Plan Figure 3B were investigated as part of the EIR analysis process. Based on the original documentation that established the preserve, Master Plan Figure 3B was found to be inaccurate and the boundaries shown on Airport Master Plan Figure 3B will be revised accordingly. The figures provided in the Draft EIR accurately delineate the boundaries. Although a Burke's goldfields population occurs outside the actual preserve boundaries, the Airport shall continue to avoid development and management actions that would conflict with protecting this population. As described in the response to comment #B3-13 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72, if any long-term project elements are proposed within this vicinity, these elements shall be designed to avoid affecting Burke's goldfield to the maximum extent feasible.

B5-4 The two locations where papoose tarplant (*Centromadia parryi* var. *parryi*) was observed are shown in Figure 4.3-4 on page 3.4-61 of the Draft EIR. One of these locations would be affected by grading work with the Proposed Project. Therefore, Mitigation Measure 3.4.1 on page 3.4-37 of the Draft EIR, which requires pre-construction seed collection and re-establishment of this species in one or more new stands, is included.

The commenter correctly identifies Hogwallow starfish (*Hesperevax caulescens*) as a California Rare Plant List 4 species that has not previously been reported in Sonoma County. The draft updated Jepson Manual does not recognize any subspecies for this species (http://ucjeps.berkeley.edu/tjm2/review/treatments/). The subspecies named in the Draft EIR was in error. Heerman's tarweed (*Holocarpha heermannii*) does not have any recognition under the California Rare Plant Ranking System; however, the commenter correctly points out that this species is rare in Sonoma County.

Table 3.4-1 on pages 3.4-15 through 3.4-23 of the Draft EIR has been revised to add the following:

Species	**Status**	**Habitat**	**Occurrence or Potential for Occurrence in Airport Study Area**
Heerman's tarweed *Holocarpha heermannii*	None	Valley and foothill grasslands and woodlands.	Suitable habitat in grasslands and oak woodlands; occurs in one location in the Airport Study Area.
Hogwallow starfish *Hesperevax caulescens*	4	Mesic, clay grasslands; mud flats and shallow areas of seasonal wetlands and vernal; pools.	Suitable habitat in seasonal wetlands and vernal pools in the Airport Study Area; occurs in four locations in the Airport Study Area.

Hogwallow starfish was observed in four general locations at the Airport, as listed in Appendix A of the Biological Resource Technical Study. Two of these locations (Reach Helicopter and Maintenance Shop areas) are well removed from any short- or long-term project-related disturbances. Populations in these locations would be unaffected (see Figure 3.4-4 on page 3.4-62 of the Draft EIR for general Airport locations). However, the two other locations are in the Infield Area and the South of Infield Area within which grading would occur under both short-term, and possibly long-term, project elements. Heerman's tarweed was observed in one location, north of the Goldfield Preserve, within which grading would occur for short-term project elements.

The precise locations of these species occurrences were not recorded. Consequently, the potential exists for either short- or long-term project elements to affect these species, depending on the precise locations of the populations and the limits of the grading work. Impact 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):

Impact 3.4.1: Loss or Disturbance of ~~a~~ Special-status Plant ~~Pappose Tarplant~~ Populations as a Result of Short-Term Project Elements

Grading for the RSA associated with the approach end of Runway 14 would occur within an area that supports one of the Airport's two populations of pappose tarplant, which is a CRPR 1B species (see Figure 3.4-9). ~~As a consequence, the Proposed Project is likely to cause a significant adverse affect to this species.~~ Grading for project elements 1A8, 1A9, 2A4, 2A5, 1S4 and 1S6 would have the potential to occur within areas that support hogwallow starfish (a CRPR 4 species), depending on the precise location of populations of this plant species. Grading for project elements 1S4 and 1S7 would have the potential to occur within an area that supports Heerman's tarweed (a locally rare plant species) depending on the precise location of populations of this plant species. The loss or disturbance of any of these special- status or rare plant populations would be a significant impact.

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[58] 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.

Appropriately-timed pre-construction botanical surveys shall be conducted for the presence of hogwallow starfish and Heerman's tarweed within the areas to be disturbed for grading for project elements 1A8, 1A9, 2A4, 2A5, 1S4, 1S6 and 1S7. If occurrences of these species are observed within the areas to be graded, then topsoil shall be salvaged from the affected areas following seed set for each species. Collected topsoil shall be used to re-establish populations of these species within suitable areas selected by the Project Biologist following completion of grading. The Project Biologist 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 plant populations will be conducted, if required by DFG.

Additionally, the following is added at the end of page 3.4-55 of the Draft EIR.

Impact 3.4.23: Loss or Disturbance of a Hogwallow starfish Populations as a Result of Long-Term Project Elements

[58] 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.

Long-term project elements 10L1, 1S6, 7A and 8L would have the potential to cause a significant adverse affect on hogwallow starfish (a CRPR 4 species) depending on the precise location of populations of this plant species and the future grading plans that would be developed for these project elements.

Mitigation Measure 3.4.23

Appropriately-timed pre-construction botanical surveys shall be conducted for the presence of hogwallow starfish within any areas that would be disturbed grading for following long-term project elements: 10L1, 1S6, 7A and 8L. If occurrences of this species are observed within the areas to be graded, then topsoil from the affected areas shall be salvaged and used to re-establish hogwallow starfish populations in accordance with the provisions of Mitigation Measure 3.4.1.

B5-5 As stated in the response to comment #B3-6 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72, the Draft EIR is required to address the potential impacts of the proposed project on existing baseline conditions at the Airport; it is not required to address or mitigate the protective status or management structures for preserves that were established between 11 and 27 years ago for purposes entirely unrelated to the Proposed Project.

As described in Impact 3.4.9 on pages 3.4-44 and 3.4-45 of the Draft EIR, the Proposed Project has been designed to avoid any impacts to these three existing preserves and is therefore consistent with the Conservation Strategy. It should be noted that the three preserves were established well before the Santa Rosa Plain Conservation Strategy was adopted; therefore, the County is not necessarily required to retroactively modify the preserves' management structures to meet the Conservation Strategy's guidelines. However, it is possible that the County could adopt and fund improved management plans for the preserves, more in keeping with Conservation Strategy guidelines, in association with the additional mitigation measure identified in the response to comment #B3-12 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

The citation of a previous recommendation for experimental manipulations of Burke's goldfield's populations at the Airport is acknowledged. Such an experimental program could be implemented in association with the possible additional mitigation measure identified in the response to comment #B3-12 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72.

The recommendation that the private parcel containing the Santa Rosa Plain's single known occurrence of many-flowered navarretia be considered for acquisition is noted. As stated in the response to comment #B3-14 of the letter submitted by the Sonoma County Water Coalition (Comment Letter B3) on page 5-72, the County intends to explore all available options for off-site mitigation, including lands adjoining the Airport Study Area and lands in the Windsor Plant Conservation Area.

COMMENT LETTER B6 – LETTER SUBMITTED BY SONOMA MARIN OPEN SPACE INITIATIVE

SONOMA MARIN OPEN SPACE INITIATIVE

9291 Old Redwood Highway
P.O. Box 100
Windsor, California 95492-0100

RECEIVED
SEP 19 2011
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

VIA FACSIMILE
Crystal Acker
Permit & Resource Management Dept.
2550 Ventura Ave.
Santa Rosa, CA 95403

Re Agricultural Lands.

Dear Ms. Acker,

Thank you for your recent communications re Agricultural Infringements for the Sonoma County Airport.

1 The Charles M. Schulz Airport is congenial and pleasant due to the small town atmosphere that prevails in Sonoma County. One experiences the same respect for Open Space Conservation flying to Santa Barbara.

In particular our 3500 constituents, would strongly disapprove of any encroachments upon the farming open spaces at the County's Correctional Institute that prides itself in farming and agriculture values. Please be certain to modify any plans so they do not intrude upon this long standing and popular Sonoma County tradition.

Respectfully submitted.

Sincerely yours,

Bud Wilcox
Chairman
Sonoma Marin Open Space Initiative
BLW.jmr
(707) 565-1103

RESPONSE TO COMMENT LETTER B6 – LETTER SUBMITTED BY SONOMA MARIN OPEN SPACE INITIATIVE

B6-1 This comment does not specifically address the analyses contained in the Draft EIR. The Proposed Project does not include any short-term or long-term project elements that would affect the existing open space at the Sonoma County Correctional Institute. The comment 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.

COMMENT LETTER B7 – LETTER SUBMITTED BY SONOMA COUNTY ALLIANCE

Sonoma County Alliance

A Healthy Environment Depends Upon A Healthy Economy

President 2011
Mike Martini, Taft Street Winery
President Elect 2011
Iver Skavdal, Winzler & Kelly
Immediate Past President/SCAPAC
Larry Wasem, Airport Business Center

Directors:

Scott Adams, Comcast
Tony Alvarez, Santa Rosa City Employees Assoc.
Mike Arendt, Retired
John Bly, ECA
Brad Bollinger, North Bay Business Journal
Amy Bolten, Sonoma County Water Agency
David Brown, Bank of Marin
Keith Christopherson
Don Codding, Codding Enterprises
Jonathan Coe, Santa Rosa Chamber
Brad Conners, Santa Rosa Police Officers
Terry Darcy, Darcy's Fine Jewelers
Howard Daulton, Exchange Bank
Paul Donaldson, Team Ghilotti, Inc.
Pete Downs, Kendall Jackson
Bill Focha, Sonoma County Deputy Sheriffs Ass.
Eric Goldschlag, Santa Rosa Police Department
Dennis Harter, Sequoia Pacific Mortgage
Kathy Hayes, North Bay Association of Realtors
Doug Hilberman, Axis Architects
Brian Howlett, Pacatte Construction
Greg Hurd, BKF Engineers
Mark Ihde, Goodwill Industries
Judy James, Republic Services
Tom Jones, Brelje & Race
Katie Kerns Davis, PG&E
Pat Kilkenny, Kilkenny Advisors
Scott Kincaid, First Community Bank
Ken Lafranchi, Lafranchi Architecture
Ross Liscum, Century 21
Wally Lowry, Retired Instructor
Danielle Matthews Seperas, Calpine
Lex McCorvey, Sonoma County Farm Bureau
Mick Menendez, Pacific Advisors
Curt Nichols, Carlile Macy
David Perry, Pacific Landscapes, Inc.
Jim Salyers, North Bay Corporation
Tim Smith, Consultant
Chris Snyder, Operating Engineers No 3
Marlene Soiland, Soiland Management
Jack Thomas, Santa Rosa Fire Fighters
Phil Trowbridge, Taylor Mountain Inc.
Kimberly Waite, Fidelity National Title
Kris Wilson, St. Joseph's Health Systems
Keith Woods, North Coast Builders Exchange
Phil Wyatt, Wyatt Irrigation

Chief Executive Officer
Lisa Wittke Schaffner

September 19, 2011

Crystal Acker
County Of Sonoma Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa CA 95403

RECEIVED
SEP 19 2011
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

Subject: Airport Safety Enhancements

Dear County of Sonoma Permit and Resource Management Department:

We have learned that the Charles M. Schultz Sonoma County Airport is in the process of the Environmental Impact Report (EIR) in regards to the airports safety enhancements. We are writing to you in support of their application.

1 Our organization has 350 business members, individuals and organization and work on economic development issues and educates and advocates for Sonoma County Business. We believe with limited local airline service, travel is a major inconvenience and expense hurting our existing companies and adding another reason for businesses not to expand or relocate here. It also adds to the already significant traffic burden on the area's highway system. The addition to the schedule of an eastern destination like Denver would greatly improve our air travel options and thus business in Sonoma County.

We strongly support the ongoing efforts of the Charles M. Schulz, Sonoma County Airport and local businesses, to increase airline service. Commercial air service to other areas and is part of our thirty year focus of supporting multi-modal transportation system in Sonoma County. It is important for you to know that airline service will benefit many people and communities beyond Sonoma County. The adjoining counties of Lake, Mendocino, Napa, and Marin will benefit greatly from increased airline service in Santa Rosa.

2 We would also like to advocate for the addition of a SMART train stop in the Airport area to help connect our transportation systems.

3 Please help us improve and expand airline service by approving the airport's safety enhancements alongside many other supportive local businesses in Sonoma County.

Thank you,

Lisa Wittke Schaffner
Chief Executive Officer
Sonoma County Alliance

Post Office Box 1842 • Santa Rosa, CA 95402 • 707-525-8377 • CEO@SonomaCountyAlliance.com

RESPONSES TO COMMENT LETTER B7 – LETTER SUBMITTED BY SONOMA COUNTY ALLIANCE

B7-1 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment in support 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.

For a discussion of new airline service, please see Master Response A on page 4-2.

B7-2 The SMART Train stop at the Airport is not included as a short-term or long-term project element of the Proposed Project. Moreover, the decision on where to place stops for the SMART Train does not fall within the jurisdiction of the County of Sonoma. The lead agency for the SMART project is the Sonoma-Marin Area Rail Transit, not the County of Sonoma.

B7-3 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment in support 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.

COMMENT LETTER B8 – LETTER SUBMITTED BY NORTH BAY LEADERSHIP COUNCIL

BOARD OF DIRECTORS

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RICHARD "DICK" GHILOTTI
Owner & President
Ghilotti Construction

PAUL GIBSON
Area Vice President-North/East Bay
Comcast

KENT HARVEY
Senior VP, Chief Risk and Audit Officer
Pacific Gas & Electric Corporation

JAMES KIMBALL
Senior Vice President
Wells Fargo Bank

KEVIN KLOCKENGA
President and CEO
St. Joseph Health System – SC

BRUCE KYSE
Publisher
Press Democrat

DR. MARY MARCY
President
Dominican University of California

BRETT MARTINEZ
President & CEO
Redwood Credit Union

MARY MCEACHRON
Acting COO & General Counsel
Buck Institute for Age Research

CRAIG NELSON
Executive Vice President
Nelson Family of Companies

LESLIE PERRY
Partner
Perry, Johnson, Anderson, Miller
& Moskowitz LLP

Chairman Emeritus
GORDON RADLEY
Retired President
Luxottica, Ltd.

Board Member Emeritus
TOM FORSTER
Former Director of Operations
Luxottica, Ltd.

CYNTHIA L. MURRAY
President & CEO

SONIA R.TANNER
Executive Business Administrator

NORTH BAY LEADERSHIP COUNCIL

RECEIVED
SEP 19 2011
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

September 19, 2011

Crystal Acker
County of Sonoma Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403
Subject: Airport Safety Enhancements

Dear County of Sonoma Permit and Resource Management Department:

North Bay Leadership Council (NBLC) has learned that the Charles M. Schulz Sonoma County Airport is in the process of the Environmental Impact Report (EIR) in regards to the airports safety enhancements. We are writing to you in support of their application.

NBLC's members do a great deal of business outside of the Northern California area. Our employees travel frequently in connection with our activities. Currently, with limited local airline service, travel is a major inconvenience and expense. It also adds to the already significant traffic burden on the area's highway system. The addition to the schedule of an eastern destination like Denver would greatly improve our air travel options and thus business in Sonoma County. 1

NBLC strongly supports the ongoing efforts of the Charles M. Schulz, Sonoma County Airport and local businesses, to increase airline service. Commercial air service to Denver would also be beneficial to the Sonoma County economy, making it more attractive to companies considering locating jobs here. It is important for you to know that airline service will benefit many people and communities beyond Sonoma County. The adjoining counties of Lake, Mendocino, Napa, and Marin will benefit greatly from increased airline service in Santa Rosa.

Please help us improve and expand airline service by unanimously approving the airport's safety enhancements alongside many other local businesses in Sonoma County.

Sincerely,

Cynthia Murray

Cynthia Murray
President and CEO

RESPONSE TO COMMENT LETTER B8 – LETTER SUBMITTED BY NORTH BAY LEADERSHIP COUNCIL

B8-1 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment in support 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.

For a discussion of new airline service, please see Master Response A on page 4-2.

COMMENT LETTER B9 – LETTER SUBMITTED BY SANTA ROSA CHAMBER OF COMMERCE

Santa Rosa
chamber of commerce

Mission Statement: The Santa Rosa Chamber of Commerce is the leading organization dedicated to the success of business.

RECEIVED
SEP 19 2011
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT COUNTY OF SONOMA

Crystal Acker
County of Sonoma Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403
Subject: Airport Safety Enhancements

Dear County of Sonoma Permit and Resource Management Department:

The Santa Rosa Chamber of Commerce has learned that the Charles M. Schulz Sonoma County Airport is in the process of the Environmental Impact Report (EIR) in regards to the airports safety enhancements. We are writing to you in support of their application.

Our Santa Rosa Chamber of Commerce members do a great deal of business outside of the Northern California area. Our members travel frequently in connection with our activities. Currently, with limited local airline service, travel is a major inconvenience and expense. It also adds to the already significant traffic burden on the area's highway system. The addition to the schedule of an eastern destination like Denver would greatly improve our air travel options and thus business in Sonoma County.

1 We strongly support the ongoing efforts of the Charles M. Schulz, Sonoma County Airport and local businesses, to increase airline service. Commercial air service to Denver would also be beneficial to the Sonoma County economy, making it more attractive to companies considering locating jobs here. It is important for you to know that airline service will benefit many people and communities beyond Sonoma County. The adjoining counties of Lake, Mendocino, Napa, and Marin will benefit greatly from increased airline service in Santa Rosa. Many of our members feel so passionately about improving their business here that numerous business community representatives spoke in favor of the EIR and runway extensions/safety improvements at the recent planning commission meeting. Further, our members also rallied together to submit over 50 letters of support for the Small Service Air Grant in hopes to fast track the potential air service.

Please help us improve and expand airline service by unanimously approving the airport's safety enhancements alongside many other local businesses in Sonoma County.

Best Regards,

Jonathan Coe
President/CEO

RESPONSE TO COMMENT LETTER B9 – LETTER SUBMITTED BY SANTA ROSA CHAMBER OF COMMERCE

B9-1 This comment does not specifically address the analyses contained in the Draft EIR. Therefore, the comment in support 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.

For a discussion of new airline service, please see Master Response A on page 4-2.