

COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1	PURPOSE AND NEED		
1.1	Is the purpose of this expansion to attract another airline to our airport?	Janet Blagbrough McMillen	See General Response #1.
1.2	The material contained in the draft environmental assessment clearly delineate the justification for extending the runway, namely critical current and anticipated jet users can gainfully use the added runway length.	Harrison Freer	Comment noted.
1.3	In 2011 the ARC type was downgraded to B-II (Challenger 300 class) with the attendant reduction in approach speeds. This change should have reduced the required length yet strangely the same 1000' target is still mentioned and the 500' thought has disappeared.	Maureen Lynch	The Airport Reference Code has to do with design standards on the ground such as runway safety area and runway object free area dimensions. It does not affect the required runway length for aircraft. Chapter 1, Section 1.03, documents the runway length analysis that was conducted in accordance with FAA AC 150/5325-4B, <i>Runway Length Requirements</i> . Based on this analysis, a 1,000 foot extension is needed to accommodate the family of critical design airplanes/aircraft operating at the airport.
1.4	One letter that is public knowledge but was NOT included in the "Letters of Support" Appendix, probably because it was not a letter of support, but of rejection, came from Phil Morse who owns the largest jet with any regular usage at the airport. His Gulfstream IV would benefit more than anyone else yet his letter to the Board of Supervisors recommended against an expansion.	Travis Whitehead, Maureen Lynch	Mr. Morse's comments have been included in Appendix X (Public Comments and Response to Comments) of the EA.
1.5	In 2014, the TAF projects only 36,885 operations for 2016. By their own admission the increase in traffic is expected to be far less going forward than was predicted when the extension was first proposed so any thought of basing the "need" on conditions 5 years down the road, should be tempered by the realities so stated in the TAF forecasts that estimate only an annual increase of 0.6% per year since 2002.	Travis Whitehead	Chapter 1, Section 1.03 of the EA documents the runway extension is to accommodate existing and forecasted business jet operations at the airport within the next five years. Based on a review of business jet operations from 2009-2016 (see FlightAware data and TFMSC data in Appendix B), the compounded average annual growth rate of business jet operations is 7%. The jet fuels sales for the same timeframes show a CAGR of 7.6% (see Appendix C).
1.6	IFR operations are lower than the 2008 Master Plan Report.	Mark Westcott	See Response 1.5, IFR operations have continued to grow over the past 8 years and meet the FAA's substantial use threshold for use in determining the runway length requirements for the airport (see General Response #1 for further details on IFR operations).
1.7	Recognize need for increased runway length.	Rick Garrand, David Schwenker	Comment noted.
1.8	No credible evidence the existing airport is inadequate to meet needs.	Jack Currie	See General Response #1.
1.9	Report doesn't detail how current runway length of 5,000 fails to serve current aircraft using the airport.	Gary Loughrey, Chris Lynch	See General Response #1.
2	WETLANDS/MARL FEN		
2.1	I feel that the environmental risks have been adequately addressed, and though I regret the loss of wetlands involved, I recognize the greater benefit to my community which the extended runway will provide.	Richard A. Saunders, MD	Comment noted.
2.2	The small portion of affected wetlands areas can be easily offset by creating or extending wetlands on other parts of the property.	Harold Kilburn	Comment noted.
2.3	The draft EA deals with all the practical components of projecting, preserving marl fen vegetation, potential soil erosion, and bird and animal habitat with flexible best practice approaches to these issues.	Harrison Freer	Comment noted.
2.4	No formal survey has been conducted since 1988 [on the Marl Fen].	Travis Whitehead	A formal survey of the Marl fen was conducted by the NY Natural Heritage Program (NYNHP) in June of 2015. The results of this survey are contained in Appendix Q of the EA.

2.5	The proposed extension will drive south, in the direction of the fen and excavations and filling will occur that include the main outlet as it is located in an area that must be graded smooth. No study has been done that I am aware of to see if the Marl Fen's source or drainage will be impacted by those excavations.	Travis Whitehead	Section 4.05 of the EA states that "If required by the NYSDEC or other permitting agencies, a study of groundwater will be conducted during the project design phase." Based on comments received during the public comment period a hydrology study including the installation of well points has been included in the design phase of the project.
2.6	The Marl Fen "might" be damaged without mentioning that an 800ft wide Object Free Area must be centered on the new runway and that the Marl Fen would sit well within this area. Ponds are not allowed in the OFA.	Travis Whitehead	According to FAA AC 150/5300-13A, Airport Design, "The ROFA clearing standard requires clearing the ROFA of above-ground objects protruding above the nearest point of the RSA." . Based on a review of the topographic survey, the marl fen is at a lower elevation than the runway end (310-315 feet compared to 323 feet). As a result, the ROFA complies with FAA standards even if the marl fen is located within its limits.
2.7	It was also suggested by Gayle McKee of C&S during her presentation that only an acre of over 30 acres of Marl Fen might be affected. In all previous work the remaining outlet of the Marl Fen was described as "the Marl Fen" and was well defined in the 2005 delineation map.	Travis Whitehead	The reference to 30 acres of marl fen is based on mapping provided by the NYNHP (see Appendix I, page 72) of the EA. This graphic shows the limits estimated by the NYNHP to contain marl fen and marly pools as of 6/22/88. The limits of this entire area have not been delineated by the NYNHP only areas located on airport that could impact marl fen areas have been surveyed by the NYNHP (see field surveys in Appendix Q).
2.8	This Marl Fen will be completely obliterated/destroyed.	Travis Whitehead, Maureen Lynch, Chris Lynch	Based on further studies, the preferred alternative has changed in order to avoid impacting the 0.9 acre marl fen (see Chapter 2, Section 2.02-4 of the EA). The ILS glideslope antenna will be relocated to the east side of the runway to avoid any fill activities taking place in the 0.9 acre marl fen. The EA report acknowledges that a 0.08 acre newly surveyed marl fen would need to be filled in order to comply with FAA runway safety area grading standards. Compensatory mitigation is recommended for this loss (see Chapter 4, Section 4.05 of the EA).
2.9	Wetlands and marl fen not reproducible.	Paul Alagna	See General Response #5.
2.10	County should take measures to protect marl fen.	Maureen Lynch, Rick Garrand	See Response 2.8
2.11	Concerned that wetland mitigation will result in flooding on her property.	Marna Osterberg	Based on a meeting held with the NYSDEC and FAA on February 25, 2016 (see Appendix W, Agency Meeting), off-site wetland mitigation sites located 10,000 feet away from the airport will be considered in order to comply with FAA AC 150/5200-33B, <i>Hazardous Wildlife Attractants On Or Near Airports</i> , 2-4 (c) states that "Wetland mitigation may be necessary when unavoidable wetland disturbances result from new airport development projects or projects required to correct wildlife hazards from wetlands. Wetland mitigation must be designed so it does not create a wildlife hazard. The FAA recommends that wetland mitigation projects that may attract hazardous wildlife be sited 10,000 feet away from airports serving turbine powered aircraft". If wetland mitigation sites are located 10,000 feet away from the runway, no flooding to on adjacent properties are anticipated.
2.12	Concerned with expense to mitigate ecologically sensitive areas.	Jack Currie	Comment noted.
2.13	Proposed project destroys 11 acres of Class 1 wetlands.	Doug Beaty	See Response 2.9
3	NOISE		
	No comments on noise received as part of the 2014 public comments.		
4	AIRPORT OPERATIONS		
4.1	What exactly is the number of planes that depart and arrive at the airport every day? If no one really knows the answer to that, (and it appears no one does) how will we ever determine that the expansion will bring in more planes?	Janet Blagbrough McMillen	An actual count of total operations at the airport has not been done. However, actual business jet operations data from flightaware.com and the FAA TFMSC (see Appendix B) were used to support the purpose and need for the proposed runway extension. Based on a review of business jet operations since 2010, business jet operations have been increasing at an annual average growth rate of 7% (see Chapter 1, Section 1.03 of the EA). As a result it is projected that business jet operations at the airport will continue to grow at the same rate for the five year forecast.
4.2	Traffic volume decreasing at the airport not increasing.	Maureen Lynch	See Response 4.1

5	ECONOMIC BENEFITS		
5.1	The proposed project is beneficial to existing business/industry, better encourages new industry, helps our tourism industry, provides economic benefits, generates greater sales tax revenues, and be more likely to attract commuter and charter opportunities.	John Strough, Town Supervisor	Comment noted.
5.2	Why does the Board say this expansion will bring in millions of dollars to our area? Are there businesses that have promised this? Is there something specific that you all know that we taxpayers are not privy to? Or is this just a sincere hope and wish?	Janet Blagbrough McMillen	See General Response #3.
5.3	There is a lack of examples to substantiate many of the projected benefits.	Janet Blagbrough McMillen, Mike McCabe, Peter Brothers, Doug Beaty, Mark Westcott, Gary Lougdrey, Chris Lynch	See General Response #3.
5.4	I do not think that any major employer is likely to relocate to the Warren County area with or without a longer runway.	Phillip H. Morse	Comment noted. See General Response #3.
5.5	I think we should focus our efforts on growing and fostering new local manufacturing businesses, and on supporting local entrepreneurs who already have family and other ties to the area.	Phillip H. Morse	Comment noted.
5.6	If we have any money as a county to spend on the airport, we should seriously consider spending it on efforts that have a better articulated costs/benefit proposal, that have a pretty clearly defined list of benefits that will materialize in the near future, and that generally make common sense to most people.	Phillip H. Morse	Comment noted.
5.7	The community should be looking at ways to encourage new industry and increasing revenues at the airport.	Jerry W. Caruso, Jr.	Comment noted.
5.8	Modernization, including the runway extension, will benefit the local economy, increase safety margins for all members of the aviation community, exploit federal resources already available for local use and continue to protect a valued community asset.	Harold Kilburn	Comment noted.
5.9	I am the owner of Melvina Can Machinery Company in Queensbury. Due to the nature of my business, I can say unequivocally that we came to the area because of the airport.	Tom Cahill, President, Melvina Can Machinery Co.	Comment noted.
5.10	When our company made the decision to move to Queensbury, the proximity of the Glens Falls airport was paramount in our decision of location. As a company with customers in varying small areas, our ability to go in and out of small airports is very important to us.	Thomas G. Cahill Jr, Vice President, Melvina Can Machinery Co.	Comment noted.
5.11	The Economic Development Corporation of Warren County (EDC) has long recognized the uniqueness of the Floyd Bennett/Warren County Airport and its importance as a transportation asset, not just for the immediate County itself, but for the entire region and beyond. There is no doubt that commerce results from the Airport's presence here. It is also clear that one of the region's top sectors - tourism- benefits from its presence.	EDC, Warren County	Comment noted.

5.12	Preliminary analysis indicates that investments into this Airport facility will yield results on a number of levels (i.e. direct, indirect, and induced). Investment in first-class general aviation facilities, such as the Warren County Airport, demonstrates a commitment to growth and economic vitality to the companies and entities either considering a new location in this region or evaluating additional investment in existing facilities, equipment and jobs.	EDC, Warren County	Comment noted.
5.13	Beyond businesses already using the Airport, the EDC believes in the real possibility of attracting new industries to the area by using proximity to the Airport as a draw. In mid-2013 the Hacker Boat Company [located its] facility at the Queensbury Business Park, which is less than two miles from the Airport, providing convenient access to the Airport, which its executives regularly use and clients also use when coming to view and purchase new boats.	EDC, Warren County	Comment noted.
5.14	My business benefited as a result of having the airport / the airport is important economically to the area	Mike Parwana	Comment noted.
5.15	Benefits a small number of people.	John Salvador	Comment noted.
5.16	Corporate aviation has an effect on the local economy.	David Schwenker	Comment noted.
5.17	Sits on an economic development board and when international companies are looking to do business in areas they want services like an airport they can fly into, they don't want to use the airlines.	Thomas Longe	Comment noted.
6	SAFETY		
6.1	The proposed project makes our airport safer and better prepares the region to manage emergency situations/disasters.	John Strough, Town Supervisor	Comment noted.
6.2	The Draft EA focuses the Purpose and Need exclusively on the potential for growth provided by being able to accommodate more business jets, and to sell more fuel to the existing business jet users. As a pilot of a small piston plane I want to make sure the record reflects the safety margins that a longer run affords the "little planes" that still make up the bulk of take-offs and landings and Floyd Bennett Memorial Field.	Robert Singer	Comment noted.
6.3	Please consider the safety that a longer runway affords all pilots. / A longer runway is a safer runway.	Robert Singer, Richard A. Saunders, MD, David H. Morrisey, Tom Clements	Comment noted.
6.4	No serious accidents at our airport that were due to the airport itself, so is there a severe lack of safety at the airport?	Janet Blagbrough McMillen, Doug Beaty	See General Response #2.
6.5	Why is it that so many pilots who have used our airport find no serious safety issues, and are against the expansion? Is it more a matter of pilot skill than lack of a safe airport?	Janet Blagbrough McMillen	See General Response to Comments #1 and #2.
6.6	The airport is a valuable county asset and should be modernized to keep up with and enhance safety issues; and position itself for the NextGen environment and technology.	Jerry W. Caruso, Jr.	Comment noted.
7	PROJECT COSTS		
7.1	The airport improvements will not be a significant tax burden.	John Strough, Town Supervisor	Comment noted.
7.2	If the FAA policy is that, "airports should be as self-sustaining as possible," why are we spending more money on an airport that evidently had an operating deficit of over \$800,000, in addition to hangar bond payments of \$180,000? Shouldn't we first try to get the airport self-sustaining or at least close to it?	Janet Blagbrough McMillen	See General Response #4.

7.3	Money from the Federal, New York State, and local governments is OUR money- whether it is raised through taxes, user fees or ticket surcharges...we should be sure it is going to the most meritorious projects.	Phillip H. Morse	Comment noted.
7.4	From my perspective we have a tremendous opportunity to upgrade the utility and safety of our valuable airport, and to do it in large part by using money from the AIP Fund.	David H. Morrissey	Comment noted.
7.5	The county spending \$400,000 to gain an \$8,000,000 assets is a good business decision.	Jerry W. Caruso, Jr.	Comment noted.
7.6	Cost to the local taxpayers is minimal compared to the asset gained. 90% of the project cost is coming from the FAA- that's aviation fuel taxes and boarding fees.	Jerry W. Caruso, Jr.	Comment noted.
7.7	The average tax increase associated with the construction of the runway and continued airport support by the county is very small...even very small benefits will offset the incremental burden of increased county taxes.	Harold Kilburn	Comment noted.
7.8	I believe the runway extension is a good decision for the GFL airport. Most of the money being used comes from fees and taxes which pilots and passengers pay.	Thomas G. Cahill Jr, Vice President, Melvina Can Machinery Co.	Comment noted.
7.9	Let's be clear that one of the reasons such projects are so expensive, is the exhaustive documentation and review associated with validating need and ensuring minimum environmental impacts.	Harrison Freer	Comment noted.
7.10	FAA fuel and boarding fees fund 90% of this project, and the State of New York funds another 5%, leaving only 5% for local funding.	Harrison Freer, Mark Parwana	Comment noted.
7.11	The Federal Government is providing almost all of the improvement funds. It would be a shame to loose this opportunity forever, and have the funds go to another county.	Neal Van Dorsten	Comment noted.
7.12	This is a very expensive project - no matter whose money we use and will be using in the future.	Janet Blagbrough McMillen	Comment noted.
7.13	Concerned with taxpayers dollars being spent on project / don't want taxes going up.	Mike Quindazzi, Rick Garrand, Craig Sweet	Comment noted.
7.14	Airport operates at an annual deficit, this will increase with the runway extension.	Jack Currie	Comment noted.
7.15	Need accountability with dollars being spent.	Myron Bisyk	Comment noted.

8	CUMULATIVE		
8.1	The cumulative effects section of the EA is missing and cumulative impacts associated with two previous projects (Runway 1 RSA and Runway 1 Obstruction removal) that have taken place in the same physical area as the proposed project have not been addressed.	Travis Whitehead	Chapter 4, Section 4.09 of the EA addresses cumulative impacts. This section does address the cumulative impacts associated with the Runway 1 end obstruction removal project, however, it does not address cumulative impacts associated with the Runway 1 RSA project since this took place in 2006. According to the CEQ Guidance on the Consideration of Past Actions in Cumulative Effects Analysis, June 24, 2005 "CEQ interprets NEPA and CEQ's NEPA regulations on cumulative effects as requiring analysis and a concise description of the identifiable <u>present effects</u> of past actions to the extent that they are relevant and useful in analyzing whether the reasonably foreseeable effects of the agency proposal for action and its alternatives may have a continuing, additive and significant relationship to those effects...Generally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions.... CEQ regulations do not require the consideration of the individual effects of all past actions to determine the present effects of past actions. The Runway 1 RSA project impacts were mitigated in accordance with federal and state permits. As a result, there would be no present effects of this past action and it was not included in the cumulative impacts section of the EA. The Runway 1 obstruction removal project was ongoing during the preparation of this EA (completed in 2015). As a result, this project was included in the cumulative impact section of the EA.
9	PUBLIC PARTICIPATION		
9.1	The first issue that I have is the (apparent) lack of participation of the Warren County Supervisors vis-à-vis the public. I don't believe I've attended any airport meeting at which all supervisors were present.	Janet Blagbrough McMillen	Comment noted.
9.2	Areas of non-compliance with public participation requirements. Only one properly noticed hearing is noted in over 10 years since the runway was proposed in 2002. I question even that notice which was placed in a little read secondary newspaper (North Creek News Enterprise).	Travis Whitehead	Chapter 4, Section 4.11 documents the public participation process that has taken place as part of the EA and did identify that one proof of publication was not available since the newspaper did not maintain records going back to 2010. In addition, the report acknowledges that due to an administrative error notice of the public hearing on October 23, 2014 was not published. The notice was made available on the County's website and over 80 people showed up to the meeting. Since this meeting was not properly noticed it did not meet NEPA requirements. According to FAA Order 5050.4B, <i>National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions</i> , Section 403 states "One way to effectively meet public participation requirements is to conduct a public hearing." A public hearing was held on April 5, 2017 that complied with FAA requirements (i.e., including publishing notices in area wide newspaper or local newspaper at least 30 days before the date of the hearing). Appendix W of the EA Report contains the public hearing notices, presentation, meeting sign in, and transcripts. Based on the requirements above, NEPA public participation requirements have been met.
9.3	I have asked to see where any other meeting was properly noticed and have had no response. At this point I can only assume the legal notice was never placed and the process must be repeated to comply with the law.	Travis Whitehead	See Response 9.2
10	DEC PERMIT REQUIREMENTS		
10.1	As stated in the Freshwater Wetlands Permit Requirements regulations (6NYCRR Part 663.5), projects must satisfy a compelling economic or social need to be approved by the NYSDEC. There is absolutely nothing "compelling" in the EA that says we "must" extend that runway to avoid the need for a re-fueling stop on a very long haul, which by FlightAware statistics and their own admission in the noise analysis section, is a very unlikely event.	Travis Whitehead	This document has been prepared to comply with federal NEPA requirements and meets those requirements as identified in General Response #1. A SEQR EIS and state wetlands permit will be required prior to construction of the proposed project. The SEQR EIS and wetlands permitting will take place in conjunction with design of the project.

11 ARCHEOLOGICAL RESOURCES			
11.1	This buffer area (for MSS1, MDS2, and Structure G) was cleared during the winter of 2013-14 in violation of the permit conditions that it be "undisturbed" and a more northerly unauthorized tree removals during the Spring of 2014. This false and misleading information regarding the state of this area is included in the subject Draft EA presented to the public on 10/23/2014.	Travis Whitehead	At the request of the OPRHP, an in-field inspection was conducted by Hartgen Archeological Associates, Inc. in January 2015 on the lands surrounding the O. Harris and J. Horgan Historic Sites to determine if the sites were impacted by vegetation removal. Based on the results of the inspection, Mr. Philip Perazio, OPRHP, responded in a letter dated April 2, 2015 " <i>SHPO recommends that no damage has been done to the two identified archeological sites by the recent vegetation removal. We continue to recommend that the planned project will have No Adverse Effect on historic properties listed of eligible for listing on the National Register of Historic Places provided that the agreed-upon site protection measures are implemented.</i> " The in-field inspection and SHPO response letter have been added to Appendix O of the EA Report.
11.2	"Avoidance Plan" was sent to OPRHP which again clearly stated the sites were located "outside the proposed vegetation removal APE" but if removals "did" occur there would be protections including no tree grubbing. Not only were the trees cleared, planting were placed on grubbed ground with grubbing work extending to the very steps of MDS2.	Travis Whitehead	See Response to 11.1
12 RUNWAY LENGTH ANALYSIS			
12.1	Provided results of his runway length analysis and wanted to know how his were wrong	Travis Whitehead	Comment noted.
12.2	It will be shown that the present runway length is already sufficient, and that the length calculated in the draft EA did not follow FAA guidance	Travis Whitehead	Comment noted.
12.3	As the FAA will provide the bulk of funds to this enterprise, it should bear the bulk of the responsibility to see that the information and analysis is accurate	Travis Whitehead	Comment noted.
12.4	It will be shown that few if any flights a year might have wished to put on more fuel before taking off, which will be shown to be the primary driver of increased runway length. Less than one flight a day for the class, or few inconveniences a year for the problem, would probably not impress the layman so these thresholds are not emphasized in the draft EA	Travis Whitehead	See General Responses #1 and #2.
12.5	While we agree there is good reason to believe that a class has been chosen that reaches the 500 operations per year threshold; we feel that most laymen (and the permitting agencies) would find it disingenuous to describe this as "substantial use". At an airport that claims over 34,000 operations per year, more than 98% of all claimed operations are small single engine or twin propeller flights needing only a small reaction of either runway length	Travis Whitehead	See General Responses #1 and #2.
12.6	It is noted that well over half of the 500 critical operations were attributed to just 3 aircraft. Looking at the required runway lengths for those 3 planes at maximum weight (MTOW), the required runway is 3400' for the Citation V, 4810' for the Challenger 300 and 5281' for the Hawker 800XP	Travis Whitehead	In accordance with AC 150/5325-4B, Step 2, the runway length analysis includes identifying " <i>the airplanes that will require the longest runway lengths at maximum certificated takeoff weight (MTOW)</i> ". This will be used to determine the method for establishing the recommended runway length. Chapter 1, Section 1.03, Table 1-5 has been added in the Final EA to identify the runway lengths required for the family of critical design airplanes/aircraft operating at the airport.
12.7	Another required parameter, the "haul lengths" can also be calculated from the FlightAware databases as airport destinations for each flight are included in the database. If these distances were analyzed, they certainly were not disclosed by the engineers that developed the draft EA	Travis Whitehead	See General Response #1. A table has been added to Chapter 1, Section 1.03 that summarizes the haul length for the family of critical design airplanes/aircraft operating at the airport.
12.8	So when it suits the engineers the planes are short haul/category 1 for noise calculations, but not for runway length analysis it seems	Travis Whitehead	The noise analysis evaluates the aircraft based on stage length which is an average of annual aircraft operations for the airport which averages out to < 500 nautical miles and Stage 1. The runway length analysis evaluates the actual length of haul for each business jet aircraft in the family of critical design airplanes/aircraft operating at the airport. Based on an evaluation of FlightAware data 27% of haul lengths for the family of critical design airplanes/ aircraft are > 500 nautical miles (see General Response #1 for further details).

12.9	Both the 60% Load and the 90% Load figures are shown in the draft EA Appendix F and the numbers for GFL are pushed through both. The proper figure to choose is not subjective and was the wrong one that made it to the body of the report. If the majority of the flights are considered short hauls (i.e. under 500 NM/Stage Length 1 out of 7) then the 60% Load chart should be used and this yields a runway length of 4620' using 60% load rather than 6050' used throughout this EA which came from the 90% load chart. The existing runway length is already longer than FAA design requirements	Travis Whitehead	See General Response #1.
12.10	As an example, our most demanding aircraft in the group that regularly uses our airport, the Hawker 800XP, has a stated landing distance of 2600' at maximum load. If operating under commercial charter rules for that flight the landing distance should be increased by a factor of 1.667, or in this case to 4334'. If furthermore the runway is deemed to be wet, an additional 15% margin is added or 4984'. The problematic Hawker can still land at our existing runway length, even when operating under strict part 135 requirements on a wet runway	Travis Whitehead	A table has been added to Chapter 1, Section 1.03 that provides the takeoff and landing lengths for the family of critical design airplanes/aircraft. Refer to General Response #1 that also contains this table. This table documents the runway length is inadequate for takeoff for six aircraft (Cessna 650, Falcon 20/501/2000/900, and Hawker 800) in the family of critical design airplanes/aircraft. The table also shows that the runway length is inadequate for landing during FAR Part 135 operations for eight aircraft (Challenger 300, Citation CJ2/CJ4, Citation Excel, Falcon 20/2000/900, and Hawker 800) in the family of critical design airplanes/aircraft.
12.11	The runway length calculations have not been properly done in this draft EA	Travis Whitehead	Comment noted. See General Response #1.
12.12	Federal design standard for Class B-II at GFL design elevation, temperature, and documented haul length is 4620'. Runway grooving could be ignored and an increase of 15% for wet weather could be added in a stretch to 5300'	Travis Whitehead	See General Response #1.
13	QUESTIONS NOT RELATED TO CURRENT PROJECT (NO RESONSE NECESSARY)		
13.1	Why is our county airport so much more expensive to run than other larger, busier airports?	Janet Blagbrough McMillen	Comment noted.
13.2	Why are we expanding a runway that is "rarely used" (Runway 30) and paying good money to get land to do so (by eminent domain), thus forcing Warren County taxpayers to pay school and county taxes to Washington County in perpetuity, on top of the more than a million it will cost for the expansion itself?	Janet Blagbrough McMillen	Comment noted.
14	GENERAL COMMENTS		
14.1	It is also important to note that timeliness is an issue here as the County has begun proceeding in an eminent domain taking of lands "needed" for the extension, and as a taxpayer I will be burdened with that cost if the FAA decides at a later date not to reimburse for this land valued at over a Million dollars	Travis Whitehead	There is no land acquisition required for the proposed runway extension. Chapter 2, Section 2.02-4 provides a bulleted list of what the runway extension project includes.

COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1	PURPOSE AND NEED		
1.1	There is, to this day, no demonstrated need for the runway expansion- this airport has been downgraded twice in the past 15 years, it is currently B-II and will likely be downgraded further in the next several years due to declining traffic.	Maureen Lynch, John Caffrey	See General Responses #1 and #2.
1.2	First note that neither stated "need" is truly a "need: but rather a "convenience". This is important since the EPA and DEC are required to weigh the proposed "need" against the proposed environmental damage.	Travis Whitehead, Rachel Seeber	See General Responses #1 and #2.
1.3	It is incumbent on the FAA to see that this document does not provide false or misleading claims to Agencies less adept at understanding Airport operations.	Travis Whitehead	Comment noted.
1.4	Will a 1000 foot extension "eliminate the need for business jet operators to divert" under poor weather conditions?	Travis Whitehead	The 1,000 foot extension will not eliminate the need for business jet operators to divert under poor weather conditions. This text has been removed from the Final EA Report.
1.5	Does the existence of a well staffed, major airport (ALB) within close proximity offer a better option for a Pilot operating under difficult conditions? Would it not be advisable, give the limited staffing hours at GFL for emergency equipment and current runway condition updates for a PIC to decided to divert to ALB regardless of runway length at GFL?	Travis Whitehead	This does not meet the purpose and need for the proposed project to accommodate the family of critical design airplanes/aircraft (see General Responses #1 and #2).
1.6	Why were the reduced penalties available to operators like NetJets not mentioned? Shouldn't all options be considered?	Travis Whitehead	Typically, the most restrictive operating requirements would be considered in order to make sure all aircraft in the family of critical design airplanes/aircraft can be accommodated.
1.7	As it has been made an issue, what percentage of operations are flown under Part 135 or 91K rules?	Travis Whitehead	According to Part 91.501 (b), Part 91 operators may not accept compensation for a flight. This would typically include operations associated with corporate business (i.e., Saratoga Aviation) or fractional ownership programs. According to Part 135.4 on-demand operations are any operation for compensation or hire (i.e, charter operations conducted by NetJets, Flight Options, etc.). The flightaware data does not provide enough informaton on the owner and many owners names are blocked so it is not possible to provide an accurate break down of Part 91 and Part 135 operations. However, flightaware does provide a breakdown of the operations for Saratoga Aviation (255 operations) and NetJets provided an annual operatons breakdown in Appendix A -Letters of Support & Documentation (150 operations).
1.8	Is there any basis for the high numbers of diversions claimed in the first line to Table 1-1, or will all conclusions based on that data need to be re-evaluated?	Travis Whitehead	See response to 1.4.
1.9	As the need to make an intermediate fuel stop has been cited as the principal reason for the extension, how many documented or even estimated occurrence of this "need" can you point to on a yearly basis?	Travis Whitehead, Dr. Paul Alagna	The need to make an intermediate fuel stop was not cited as the principal reason for the extension. It was documented in Appendix A - Letters of Support & Documentation that aircraft currently operate under weight restrictions due to the runway length. General Response #1 provides further discussion of applicable FAA guidance used in developing the purpose and need for the project and Chapter 1, Section 1.03 of the Final EA has been revised to incorporate more detailed information on the current deficiencies.

1.10	The C&S presentation on 4/5/2017 included a slide on "hard data" that came from flightaware operations reporting. It included some haul lengths, as much as 3655 NM. Please provide (1) a copy of that slide (2) data sources where haul lengths were determined.	Travis Whitehead	Based on a review of the haul lengths, it appears that the distance provided at the public hearing of 3,655 was from Floyd Bennett Memorial Airport to Scottsdale, AZ (see Appendix W). The 3,655 was the distance in kilometers rather than nautical miles. A table has been added in Chapter 1, Section 1.03 of the Final EA that summarizes the haul lengths for the family of critical design airplanes/aircraft in nautical miles (see General Response #1 for further details).
1.11	Comments on Table 1-1 (page 1-7) state that the "high number of days that precipitation occurs...is related to the high number of diverted flights and documents that during contaminated runway conditions there is inadequate runway length." However, the correlation between precipitation and diverted flights is not apparent.	NYS DEC	The number of diversions has been removed from Chapter 1, Section 1.03 of the Final EA. General Responses #1 and #2 for further details regarding how the amount of precipitation correlates to the runway length requirements.
1.12	As mentioned during meetings at DEC Warrensburg, the public need for the runway expansion is not sufficiently documented. This section of the report, or more importantly to DEC, the intended SEQRA DEIS equivalent discussion, will need to be enhanced.	NYS DEC	Comment noted.
1.13	There is no evidence or study presented that supports this expansion.	Chrisk Aiken	See General Response #1.
1.14	The social need is nonexistent; and no one has shown where one dollar of economic benefit would accrue to anyone in Warren County, to justify loss of marl fen.	Christopher Lynch	Comment noted. See General Response #3 regarding economic benefits.
1.15	Table 1-1, on page 7 of Chapter 1, is titled Diverted Flights. When looking at the NetJets input in Appendix A, pages 11 and 12, NetJets provided data on flights that did arrive but had to "take penalties" (meaning they could not be at their max gross takeoff or landing weights). Warren County and their consultant C&S Engineers are seriously misstating this information by calling it diverted flights in Table 1-1. The claim that by adding 1,000 ft., diverted flights would be able to fly in, is a significant cost justification for the extension, however, this data is wrong. The NetJets email in the DEA quantifies flights that arrived and "took a penalty," not diverted flights. Further NetJets 2015 and 2016 data exceeds the total count of NetJets flights into GFL by a factor of 3 - for example, they show 150 flights in 2016, total NetJets flights were just 48. A copy of the NetJets study that is referred to here is missing from the DEA.	Mark Westcott, Maureen Lynch	You are correct, the NetJets data was total operations not the number of diverted flights. Table 1-1 has been removed from the Final EA Report. No additional information was provided by NetJets other than what is contained in Appendix A - Letters of Support & Documentation.
1.16	Table 1-6, on page 14 of Chapter 1, is, very damaging to the extension. If the premise in adding 1,000 ft. to make the runway safer for the target fleet of aircraft, this table kills it. It says that 75% of the Fleet at 90% Useful Load would need 6,900 feet of runway in wet conditions. So, basically, 6,000 ft. of runway still isn't enough to allow these flights to land under wet conditions, and they would still need to divert!	Mark Westcott	See General Response #1.
1.17	There has been no answer to explain the critical need to extend per the FAA guidelines	Mark Westcott	See General Responses #1 and #2.

1.18	Most frequent Jet to use GFL: the aircraft that most frequently utilizes GFL is a Hawker 800 (H25B) that flies short haul. The Hawker 800's own promotional material states it only needs a 5,000 foot runway.	Mark Westcott	Based on a review of aircraft hauls lengths contained in the flightaware data for 2015-2016, of the 580 annual operations in 2015-2016, 156 operations were to destinations over 500 nautical miles (or 27% of total operations). For the Hawker 800 operations specifically, of the 211 recorded by flightaware, 56 operations (or 27%) were to destinations over 500 nautical miles away. This information has been added to the Final EA Report in Chapter 1, Section 1.03 and Appendix B. In regards to the required runway length for the Hawker 800, the promotional materials state the runway length based on certain assumptions including an elevation at sea level and standard air temperature (i.e., 59°F). However, the runway length needs to be determined based on the specific airport elevation and standard maximum hot day temperature for the airport. The runway length requirements for the Hawker 800 were determined using actual airplane flight manual takeoff charts, an airport elevation of 328' MSL, and a hot day temperature of 77°F (see Appendix F). Using conditions specific to the airport, the Hawker 800 requires more than 5,000 feet of runway for takeoff (see General Response #1 for further details).
1.19	I think the biggest challenge with concisely stating the purpose and need is the concept that weight and balance is a critical consideration in flight planning. Due to the limitations/capabilities of virtually all modern airplanes, there are built-in tradeoffs for passenger-cargo and fuel required for any given flight. And, these have a lot to do with weather, which is unpredictable. These takeoff and landing data (TOLD) calculations are made for every flight, with built-in safety margins. Some of these are regulatory, like the 60% rule (FAR, 135.385); others are judgment related.	Harrison Freer	Comment noted.
1.20	The fastest growing sector of aviation is business jets, a 5,000 foot runway doesn't accommodate most business jets with full loads.	John Strough	Comment noted.
1.21	Runway extension a safety issue, FAA website documents significant number of overrun accidents.	David Schwenker	Comment noted.
2	WETLANDS/MARL FEN		
2.1	Environmental impact of the extension will not be offset by either improved safety of the airport or increased economic activity of the Warren County area. The marl fen that would be lost to the expansion is a unique and irreplaceable natural resource.	Stuart Field	Comment noted.
2.2	There is no feasible mitigation plan that would result in a fen that is identical to that which would be lost due to the runway expansion.	Stuart Field	See General Response #5.
2.3	The New York State Department of Conservation's Freshwater Wetlands Guidelines on Compensatory Mitigation states that the mitigation should be "undertaken within or contiguous to the wetland impacted". The proposed runway expansion does neither.	Stuart Field	Based on a meeting held with the County, NYSDEC, ACOE, and FAA in February 2016 (see Appendix W, Agency meetings), NYSDEC agreed to the consideration of off airport wetland mitigation for non marl fen areas to comply with FAA AC 150/5200-33B, <i>Hazardous Wildlife Attractants on or Near Airports</i> .
2.4	The expansion project should not be approved or started absent proof that a viable, identical fen has been created.	Stuart Field	Comment noted. See General Response #5 for additional information.
2.5	If we have within our keeping 10% of all the Marl Fen's our planet contains, how can we as a thoughtful human race move forward and approve this project?	Gail Solomon	Comment noted.

2.6	Opposes the proposed extension of the runway further into the wetlands.	Big Cedar Swamp Coalition	Comment noted.
2.7	No mitigation has been proposed for 10+ acres of wetlands, 12 acres of regulated buffer, and 20 acres of tree cutting in wetlands.	Big Cedar Swamp Coalition	Chapter 4, Sections 4.05 and 4.06 include a discussion of impacts to the marl fens and wetlands, as well as identifying potential mitigation measures to reduce impacts. In regards to tree clearing in wetlands. Figure 4-7 in Chapter 4 of the EA identifies that 3.4 acres of the 23 acres of tree clearing will take place in wetlands. See General Response #5 for further information.
2.8	The destruction of .08 acres of marl fen and the risk of creating adverse hydrogeological impacts to another .9 acres of marl fen, threatens a full 10% of the world's known total of this Globally Rare habitat type.	Big Cedar Swamp Coalition	As stated in Chapter 3, Page 3-14, based on observations made by Greg Edinger of NYNHP, the 0.08 acre marl fen has been flooded for an extended period of time and appears to be transitioning to a marsh or pond community. He also stated that the 0.9 acre marl fen is in good condition despite past human disturbances that include ditching, damming, and filling in and around the fen since the mid-1980s. In fact, the condition of the 0.9 acre marl fen was upgraded by Greg Edinger in the Element Occurrence Report to CD - Fair to Poor estimated viability in 2015 (see Appendix Q, page 118) from a previous Element Occurrence Report of D - Poor estimated viability in 1984 (see Appendix I, page 68). Based on the results of numerous meetings and email communications that took place with the NYSDEC and ACOE (see Appendix W, Agency Meetings and Appendix I), some conceptual measures were recommended to address NEPA requirements and are identified in Chapter 4, Sections 4.05 and 4.06 of the EA. Marl fen mitigation measures were developed based on these communications that included creating new marl fen areas, draining the area beyond the runway safety area to reduce water levels to possibly facilitate development of additional marl fen, removal of several beaver dams that have caused prolonged flooding to the marl fen community which if removed may also provide an opportunity for other flooded areas within Wetland A to assume Marl fen community like attributes, and enhancing other state recognized marl fen areas. Based on public concerns that were raised regarding hydrological impacts to the 0.9 acre marl fen, Chapter 4, Section 4.05 has been revised and states that a groundwater/hydrology study will be completed during project design in order to address potential impacts.
2.9	<p>The New York Natural Heritage Program ("NYNHP") has made several management recommendations for the preservation of the marl fen. DEA, p.Q-2. The DEA does not discuss these recommendations.</p> <p>The NYNHP has also referred the County to its conservation guide for rich graminoid fens as a surrogate guide for marl fens. DEA, P. I-64. The DEA does not discuss this document's recommendations for the conservation and management of such fens.</p>	Big Cedar Swamp Coalition	Management recommendations for the preservation of the marl fen that were identified by the NYNHP and development and mitigation measures identified in the NYNHP conservation guide for rich graminoid fens have been incorporated into the minimization measures for the marl fen contained in Chapter 4, Section 4.05 of the Final EA.
2.10	The avoidance, minimization, and compensation measures are vague and inadequate and do not reduce the impacts of the action. Nor is there any evidence that they are feasible. For example, there is not evidence that anyone has ever tried to restore or enhance a marl fen before. Likewise, there is not evidence that suitable site for compensatory wetlands construction are available.	Big Cedar Swamp Coalition, Mike McCabe, Christopher Lynch	NYSDEC and USACE do not discuss what constitutes acceptable wetland mitigation for wetland permits prior to application receipt and review (See Page I-93) . Multiple mitigation options are presented in the EA as advised by NYSDEC and USACE and these mitigation options will be furthered explored and detailed in the permit applications. See General Response #5 for further informaton.

2.11	Grading and construction work plus the loss of trees all impact harmfully on the water runoff patterns. The additional maintenance (de-icing chemicals, sand/salt and the exhaust from the larger aircraft, and heavy equipment brought in to maintain the additional runway will increase chemical runoff into the groundwater supporting the Marl Fen.	Maureen Lynch	See General Response #5.
2.12	If damage from previous other airport construction work has already been done to an identified S1/G1 wetlands, and no remedial work has been done (as required by statute) isn't the County in violation of DEC regulations? Rather than fix the damage already done, they are proposing more.	Maureen Lynch	Wetland permits were obtained prior to the RSA Improvement project in 2006 and the 70 acres of tree clearing in 2014-2015. All mitigation measures associated with the permit conditions were met.
2.13	What steps has the County taken to keep that area from flooding? And how successful have they been?	Travis Whitehead	The County has obtained DEC permits as needed to remove beaver dams from channels surrounding the Fen. They are successful only to the extent that the beavers always return and it is a never-ending effort to control the beaver population and remove dams.
2.14	Project will affect hydrology, need to conduct a hydrology study to determine impacts to 0.9 acre marl fen.	Travis Whitehead, Maureen Lynch, Big Cedar Swamp Coalition, NYSDEC, Claudia Braymer, Christopher Lynch	Based on oral and written comments received as part of the public hearing and public comment period, a hydrology study will be completed during project design. Chapter 4, Section 4.05 of the February 2017 Draft EA identified that if the "NYSDEC required it, a groundwater study would be conducted during the project design phase". Based on the comment letter received from the NYSDEC (see Appendix X, pages 223-225), a groundwater/hydrology study will be required. As a result, the text in the Final EA has been revised to state that a study will be conducted during project design.
2.15	These wetlands have already been reduced by the 2006 RSA project. Has a study been completed to ascertain if an additional 10 acres of wetlands proposed to be filled rises to a "substantial" reduction in capacity?	Travis Whitehead	The RSA project resulted in filling 3.32 acres of wetlands. The proposed project would fill 10.57 acres of wetlands. These wetlands are part of a state designated wetland (HF-3) that totals 783 acres. Filling for the two projects amounts to a reduction of 1.7% of the entire wetland. In addition, this loss is mitigated by creating wetlands elsewhere as identified in Chapter 4, Section 4.06-4 of the EA.
2.16	Has anyone considered what affects runway melting chemicals might have on the rare Flora and Fauna that might be restored to the Marl Fen if it were better cared for?	Travis Whitehead	As identified in Chapter 4, Section 4.05 minimization measures to intercept runoff from new pavement surfaces have been recommended and include constructing infiltration trenches or dry swales to intercept runoff on either side of the new runway extension. By locating these trenches or swales in these location, stormwater runoff from the Proposed Project can be intercepted and treated before it reaches the adjacent sensitive Marl fen community located at the west side of the runway extension.
2.17	Is a pond a desired feature in the ROFA? Has the FAA already offered a waiver on this?	Travis Whitehead	According to FAA AC 150/5300-13A, Airport Design, "The ROFA clearing standard requires clearing the ROFA of above-ground objects protruding above the nearest point of the RSA." . Based on a review of the topographic survey, the marl fen is at a lower elevation than the runway end (310-315 feet compared to 323 feet). As a result, the ROFA complies with FAA standards even if the marl fen is located within its limits.
2.18	With the location of the proposed wetland mitigation area undisclosed, how can we say that other problems (environmental, social, economic) might not result?	Travis Whitehead	The wetland mitigation areas must go through the SEQR process and cannot adversely impact the environment.
2.19	The NYSDC Freshwater Wetlands Guidelines on Compensatory Mitigation states that the mitigation should be "undertaken within or contiguous to the wetland impact. The proposed runway expansion does neither.	Stuart Field, Travis Whitehead	Based on a meeting held between the County, NYSDEC, ACOE, and the FAA in March 2016 (see Appendix W, Agency Meetings), the NYSDEC agreed to consider potential off airport wetland mitigation sites (for non marl fen areas) to comply with FAA AC 150/5200-33B, <i>Hazardous Wildlife Attractants on or Near Airports</i> .

2.20	The Preferred Alternative (page 2-21) indicates that impacts to the larger fen will be avoided. Though this alternative would avoid impacts from fill, it is not yet possible to be certain that impacts from construction and long term operation on hydrology and other aspects of the fen and wetland community are entirely avoided.	NYS DEC	Comment noted. The text in Chapter 4, Section 4.05 under the marl fen mitigation measures has been revised and states that a groundwater/hydrology study will be done during project design.
2.21	The assessment (page 4-22) of the impact of the project on the hydrology of the marl fen is not adequate, as only generalizations about subsurface flows following the pattern of surface flows is provided. Considering the rarity and susceptibility of the marl fen, a more complete on-site analysis should be provided.	NYS DEC	See Response 2.14.
2.22	The information and discussion of the effect of the clearing (page 4-24) required for the project is inadequate. A map depicting the areas of wetland and wetland adjacent area that will be subject to various levels of vegetation removal is needed. The map should clearly show areas where all trees and shrubs will be removed and the areas where just trees will be removed (if any). The impact of clearing taller wetland and adjacent area vegetation may cause significant impacts to the wetland resource. The use of soft tired vehicles to access wetlands for obstruction removal is likely inappropriate. Consideration needs to be given to tree removal being completed by hand. Where hand clearing is not feasible, the use of swamp mats will be needed.	NYS DEC	Figure 4-7 in the EA identifies the areas of tree removal within wetlands, the wetland buffer area, and outside of wetland areas and includes a table with acreages affected in each of these areas.
2.23	Runoff from the runway could contain deleterious substances from normal operations, and specifically from winter deicing. Controls and filtering of the runoff will be needed to reduce the potential for impacts to wetlands. In particular, runway runoff should not be allowed to drain into the wetland and marl fen. How this occurrence will be avoided should be explained.	NYS DEC	See General Response #5.
2.24	The discussion of the mitigation for the marl fen (page 4-28) mentions helping to restore other marl fens as mitigation for the lost fen. Additional details on what will be planned under this effort is needed.	NYS DEC	The measures identified in the EA are conceptual level only and were developed in coordination with numerous meetings held with the NYSDEC (see Appendix W, Agency Meetings, and Appendix I). Further details and information will be provided to the NYSDEC during the project design, permitting, and mitigation design phase of the project.
2.25	Tables 4-5 shows 3.4 acres of temporary disturbance associated with vegetation removal. However, DEC would argue that the removal of most of the over-story vegetation is permanent impact (permanent cover-type conversion).	NYS DEC	Chapter 4, Table 4-5 and pages 4-37 and 4-38 of the Final EA have been revised to state the vegetation removal is considered a permanent impact (permanent cover-type conversion).
2.26	Table 4-6 and the discussion on page 4-39 indicate that mitigation will include restoration and creation of wetlands at a 1.5 to 1 ratio. As noted by DEC in prior communications, considering the unique high quality of the wetlands to be lost, and the loss of considerable portions of adjacent area, mitigation may be expected at more than a 1.5 to one ratio. Further, more than 12 acres of adjacent area will be filled and graded, and 3.4 acres will have the cover type permanently converted. Mitigation may be expected for the loss of benefits and functions to the wetland from this adjacent area impact. Details on the mitigation still need to be worked out.	NYS DEC	Comment noted.
2.27	No argument I have heard could justify destroying the Marl Fen.	Christopher Lynch	Comment noted.
2.28	On airport grounds, approximately 10% of the world's marl fen population exists, and our representatives are trying to destroy it under a runway that rarely, if ever, will be used.	Christopher Lynch	Comment noted.
2.29	In Warren County, we have yet to even do a comprehensive survey of either the fens, or the underlying calciferous conduits.	Christopher Lynch	Appendix Q of the EA contains the results of a site walkover conducted by the NYNHP in November of 2014 and a marl fen and rare plant survey conducted by NYNHP in June 2015. See Response 2.14 for further information.

2.30	Marl fen can never be replaced if they destroy it.	Christopher Lynch, Doug Beaty	Comment noted.
2.31	The plan summary admits it will kill just under ten acres of adjacent wetlands, but ignores the impact this might have on the fen, they don't even look at it.	Christopher Lynch	Chapter 4, Sections 4.05 and 4.06 include a discussion of impacts to the marl fens and wetlands, as well as identifying potential mitigation measures to reduce impacts.
2.32	Concerned about effect project will have in regards to water problems and flooding associated with disturbing wetlands. / Where will wetland mitigation take place?	Tara Kilmartin, Dennis Kelly, Brad McGowan	Based on a meeting held with the NYSDEC and FAA on February 25, 2016 (see Appendix W, Agency Meeting), off-site wetland mitigation sites located 10,000 feet away from the airport will be considered in order to comply with FAA AC 150/5200-33B, <i>Hazardous Wildlife Attractants On Or Near Airports</i> , 2-4 (c) states that "Wetland mitigation may be necessary when unavoidable wetland disturbances result from new airport development projects or projects required to correct wildlife hazards from wetlands. Wetland mitigation must be designed so it does not create a wildlife hazard. The FAA recommends that wetland mitigation projects that may attract hazardous wildlife be sited 10,000 feet away from airports serving turbine powered aircraft. If wetland mitigation sites are located 10,000 feet away from the runway, no flooding to on adjacent properties are anticipated.
2.33	Mitigation measures have been recommended to enhance the ecology and make the marl fen healthier.	John Strough	Comment noted.
2.34	2014 survey by NYNHP identified a new 0.2 acre marl fen, why has the acreage changed to 0.08 acres?	Claudia Braymer	Appendix Q, page Q-6 contains an email from the NYNHP stating that 0.08 acres is the correct acreage for the smaller marl fen area.
3	NOISE		
3.1	Concerned about impact of noise.	Carl Rudio	Comment noted.
3.2	The noise contour charts (Figures 4-2, 4-3, 4-4) are not properly scaled and appear to be incomplete.	Harrison Freer	Based on a review of the noise contours charts and measurements of the runway length's the scales are accurate. Please note that Figures 4-32 and 4-3 show the existing 5,000 foot runway. Figure 4-4 shows the future 6,000 foot runway.
3.3	There are no noise contours on Fig 4-2?	Harrison Freer	Figure 4-2 has been updated and now includes the noise contours.
3.4	There is a spike at the north end of Fig 4-3 but not at any other locations?	Harrison Freer	The FAA's Integrated Noise Model (INM) Version 7.0d was used to model aircraft operations at the airport. The INM is a FAA mandated computer program developed to plot noise contours for airports. The size and shape of each noise contour is a function of a number of different variables that include the number of aircraft operations, types of aircraft, time of operation and operational procedures. The spike found in the noise contour located north of Runway 19 is typically representative of arrival operations. Although, the profile of aircraft arriving on Runway 19 would not change the extension of the runway to south would provide additional runway length for the deceleration of aircraft and subsequent noise generated from braking. This resulted in the differences noted in the noise contour shape.

4	AIRPORT OPERATIONS		
4.1	Operations usage declining then report goes on to project increased usage.	John Caffrey, Dennis Kelly	Although general aviation activity has declined at the airport, the business jet operations have been growing. The business jet operations are what is used to document that FAA substantial use thresholds are met for conducting the runway length analysis and documenting the need for a 1,000 foot runway extension. Based on actual business jet operations data from flightaware.com and the FAA TFMSC (see Appendix B), business jet operations have been increasing at an annual average growth rate of 7% (see Chapter 1, Section 1.03 of the EA). As a result it is projected that business jet operations at the airport will continue to grow at the same rate for the five year forecast.
4.2	How many different larger jets make up the percentage of usage at the airport?+	Clint Braidwood	See General Response #1.
5	ECONOMIC BENEFITS		
5.1	Will bring a very viable economic benefit to the area.	Tom Cahill	Comment noted.
5.2	No economic benefit. No facts to back up economic benefits.	Richard O'Connor, Doug Beaty, Maureen Lynch, Dr. Paul Alagna, Gary Schmidt, Phil Underwood	Comment noted. See General Response #3.
5.3	It will bring a large construction project to the area with many jobs.	Tom Cahill Jr.	Comment noted.
5.4	Were the Weiderman reports that were posted along with the DEA on the County website not a part of the submission to the FAA?	Travis Whitehead	The Preliminary Report was included in Appendix W as part of the comments received by the EDC. The second report was not received in time to include in the February 2017 EA Report. Both reports will be included in the Final Report as Appendix Y .
5.5	I ask you, if the annual outlay of \$800,000, which is well in excess of many airports of similar size in our area, has not brought the promised prosperity. Why would anyone think that the additional infusion of capital will change the equation?	Fred A Carvin	Comment noted.
5.6	Wasteful spending associated with operating airport.	Fred A Carvin	Comment noted.
5.7	Compelling Economic Need: The Warren County EDC commissioned a study at taxpayer expense claiming millions in economic development will be achieved with the runway expansion based on the "secret multiplier" of R.A. Wiedemann. Voila there you have it the economic study that can be used to justify the runway expansion. There are a lot of government studies that don't make common, but level sense. This is one of them.	Mark Westcott	The economic studies are not being used to justify the runway extension. The Warren County EDC commissioned the studies to address questions/concerns the public raised in regards to what the economic benefits are to the local economy.
5.8	Airport was a key in moving his business to Queensbury.	Tom Cahill	Comment noted.
5.9	How does the runway extension promote economic growth and development for people who live in Queensbury?	Ava Ashendorff, Sheryl Webster, Gary Schmidt	See General Response #3.
6	SAFETY		
6.1	It will add safety on every takeoff and landing.	Tom Cahill	Comment noted.
6.2	Arguments were proposed that support the increased safety for pilots and aircraft. Perhaps their argument would be most convincing if the FAA required this extension for safety purposes. They have not.	Gail Solomon	See General Responses #1 and #2.
6.3	It will ultimately add to safety at the airport.	Tom Cahill Jr.	Comment noted.

6.4	I ask, 7 years later the same question, and ask if ANY safety concerns remain for the existing runway?	Travis Whitehead	See General Responses #1 and #2.
6.5	Need to build in safety factors to allow for both human and mechanical errors. It takes longer to stop on snow and ice. Added margin of safety in emergencies and unfavorable conditions are important.	Tom Cahill, Richard Saunders	Comment noted.
6.6	Safety issue at airport, present runway length makes airport marginal for safety for larger jets.	Tom Clements	Comment noted.
6.7	Project not safety related. Airport safe now.	Doug Beaty, Greg Loughrey, Dr. Paul Alagna, Phil Underwood, John Webster	See General Response #2.
7	PROJECT COSTS		
7.1	There will be added cost for maintenance, security, and facility upgrades not included in the estimates / costs underestimated (i.e., wetland mitigation costs hard to estimate).	Richard O'Connor, Mike McCabe, Mark Westcott, Claudia Braymer	Comment noted.
7.2	With a very large operational loss, one has to wonder how this extra cost would turn it to be profitable.	Steve Ramant, Phil Underwood	Comment noted.
7.3	Just another unnecessary waste of taxpayer money.	John Kearney	Comment noted.
7.4	It makes no fiscal sense to turn down this money, which we have paid into.	Tom Cahill Jr.	Comment noted.
7.5	What is the latest estimate for total extension costs, including land acquisition?	Travis Whitehead	Updated costs estimates have been prepared and the 2017 cost estimate for the project is \$9.5 million dollars (see General Response #4). The updated cost estimates have been incorporated into Chapter 2, Table 2-2 of the Final EA. The Proposed Project does not involve any land acquisition (see Chapter 2, Section 2.02-4) so there are no costs shown for land acquisition.
7.6	I find the cost of tax payer money (over \$800,000 a year) to be grossly out of line and that no meaningful economic benefit has or will be obtained by the additional expenditures of "Federal Grant money" in our community.	Fred A Carvin	Comment noted. See General Response #3.
7.7	The \$8 million cost estimate is outdated and incomplete.	Mark Westcott	See Response 7.5 and General Response #4.
7.8	This project is being funded all by taxpayer money and taxpayers should have a clear, accurate understanding of the cost.	Mark Westcott	The project is not being funded <u>all</u> by taxpayers money. The Airport and Airway Improvement Act of 1982 (Public Law 97- 248) established the Airport Improvement Program (AIP). Funds obligated for the AIP are drawn from the Airport and Airway Trust fund which is supported by passenger ticket taxes, fuel taxes and other fees. For most small primary, reliever and general aviation airports, the grant covers 90 percent of eligible costs. In addition NYS contributes 5% of eligible costs. This leaves the remaining 5% of eligible project costs to be paid by the County. For the proposed runway extension, the 2017 cost estimate for the project is \$9.5 million, 90% of this or \$8.5 million paid by the FAA, and \$475,000 would be paid equally by NYS and the County.

7.9	Will Warren County and C&S Engineering include a return-on-investment calculation for the local portion of the TOTAL cost of the runway extension? (Not just the construction cost, but including the land acquisition cost, cost of all the studies and evaluations done over the past 12 years, fees paid to C7S Engineers, current lawsuit with the owner of the land being taken by eminent domain, an evaluation of the annual additional operating cost of maintaining another 1,000 runway, 1,400 feet of taxiway, and the surrounding acreage of land?)	Mark Westcott, Gary Schmidt	See General Response #4.
7.10	The FAA's own guidelines stipulate an airport that receives millions of federal dollars needs to move to self-sustainability	Mark Westcott, John Currie	See General Response #4.
7.11	If County doesn't accept the FAA funds the dollars will go to other communities. We should take advantage of the funding to improve the airport.	Dave Morrissey	Comment noted.
7.12	FAA provides 90% of project funding.	Tom Clements	Comment noted.
7.13	Different project costs contained in the report.	Ava Ashendorff, Mark Wescott	See General Response #4.
7.14	Nothing justifies \$8 million cost	Maureen Lynch, Peter Brothers, Clint Braidwood	Comment noted.
8	CUMULATIVE		
8.1	The DEA also fails to assess the cumulative impacts of the destruction of various types of forested habitat.	Big Cedar Swamp Coalition	Chapter 4, Section 4.09 contains a discussion of the cumulative impacts regarding tree removal projects on the Runway 1 end.
8.2	Will a description of the RSA and Obstruction projects for Runway 1 be included in the section "Cumulative Impacts"	Travis Whitehead	Chapter 4, Section 4.09 of the EA addresses cumulative impacts. This section does address the cumulative impacts associated with the Runway 1 end obstruction removal project, however, it does not address cumulative impacts associated with the Runway 1 RSA project since this took place in 2006. According to the CEQ Guidance on the Consideration of Past Actions in Cumulative Effects Analysis, June 24, 2005 "CEQ interprets NEPA and CEQ's NEPA regulations on cumulative effects as requiring analysis and a concise description of the identifiable <u>present effects</u> of past actions to the extent that they are relevant and useful in analyzing whether the reasonably foreseeable effects of the agency proposal for action and its alternatives may have a continuing, additive and significant relationship to those effects...Generally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions.... CEQ regulations do not require the consideration of the individual effects of all past actions to determine the present effects of past actions. The RSA project impacts were mitigated in accordance with federal and state permits. As a result, there would be no present effects of this past action and it was not included in the cumulative impacts section of the EA. The Runway 1 obstruction removal project was ongoing during the preparation of this EA (completed in 2015). As a result, this project was included in the cumulative impact section of the EA.
8.3	I ask why these 2 projects in the same area have not been fully discussed in the "Cumulative Impacts" section of the present DEA?	Travis Whitehead	See Response 8.2

9	PUBLIC PARTICIPATION		
9.1	Seating for the public was inadequate for the turnout. Many of those attending were forced to stand in the back for over 3 hours to be heard, or were never heard at all; a number had to leave. Speakers were restricted to 5 minutes each and had to sign in first; yet the number of sheets to sign in on was limited, and this requirement to sign in to speak not announced until the hearing was underway. Usually these hearings are videotaped for transparency and efficiency, yet this hearing used a stenographer, which substantially slowed things down.	Maureen Lynch	The public hearing was held in compliance with FAA Order 5050.4B, 406. There were an adequate amount of sign in sheets provided for the public to sign in on (10 are included in Appendix W, some have room remaining for additional signatures). The guidelines for the public hearing and five minute time limit were presented by Mr. Girard, Chairman of the Airport Facilities Committee and Chair for the public hearing (see page 3 of the public hearing transcript) and by Mr. Reichenbach, Warren County Attorney (see pages 5-7 of the public hearing transcript contained in Appendix W) at the start of the hearing, and additional opportunities were given to the public to speak more than once (see Appendix W, April 5, 2017, hearing transcripts).
9.2	Has the FAA ever opened this channel to the public since the inception of the extension plan in 2002? When was the last time that an employee of the FAA has ever addressed the Public in Warren County?	Travis Whitehead	Comment noted.
9.3	What were the published guidelines for the hearing. Was there a stated public input limit?	Travis Whitehead	FAA Order 5050.4B, 406 (b) does not require that guidelines for the public hearing be published. The guidelines for the public hearing were presented by Mr. Girard, Chairman of the Airport Facilities Committee and Chair for the public hearing (see page 3 of the public hearing transcript) and by Mr. Reichenbach, Warren County Attorney (see pages 5-7 of the public hearing transcript contained in Appendix W).
9.4	Why are the deferred Questions and Answers not a part of the record? And has the FAA been made aware of these unpublished questions and responses?	Travis Whitehead	The deferred Questions and Answers are included as part of the record contained in Appendix W of the Final EA Report.
9.5	While the graphic on page W-77 bills the presentation as a Public Hearing, it was not noted that the hearing was not properly noticed, why is that? Was the meeting on 10/23/2014 considered a Public Hearing?	Travis Whitehead	Due to an administrative error, a notice was not published in the local newspaper to inform the public of the public hearing that was held on October 23, 2014. As a result, this meeting did not meet the requirements of FAA Order 5050.4B, 406 (b) and a new hearing was required and held on April 5, 2017. For report purposes the October 23, 2014 meeting will be identified as a public meeting.
9.6	Where is this "detailed summary" of the issues raised by the Public?? It would be good to know what the FAA is concluding about Public concerns, and a summary would be a good indication that they are listening, not just checking off boxes to get to an end point.	Travis Whitehead	The summary of concerns raised by the public will be included in Chapter 4, Section 4.11 of the Final EA Report and a detailed summary of comments and a response to comments will be included in a new Appendix X of the Final EA.
9.7	At the meeting on October 23, 2014 by one account approximately 80 people attended. 20 or more people spoke out against the runway expansion including some pilots. 6 people spoke in favor of the plans at the airport including 5 pilots. Where is this reflected in the record??	Travis Whitehead	Chapter 4, Section 4.11 will identify the number of people who attended the October 23, 2014 meeting and the April 5, 2017 public hearing and provide a table that summarizes the major concerns raised by the public, as well as those who spoke out for and against the project.
9.8	By one count, approximately 180 people attended the Public Hearing on 4/5/2017. There was far more negative feedback given than positive. Will this be reflected in the record??	Travis Whitehead	Based on the sign in sheets for the hearing (see Appendix W) there were approximately 100 people that attended the hearing. The April 5, 2017 public hearing transcripts have been incorporated into Appendix W of the Final Report. See Response 9.7 above.
9.9	Public hearing meeting a fraud. Meeting ground rules not followed, stenographer not recording, abrupt closing of meeting, not enough seating, not explaining meeting rules or comment submitting	Christopher Lynch	See Response 9.1.
9.10	I would request the FAA declare this meeting invalid, that is not to be used to check off one more box on the application. At least, we should demand a re-hearing, full and fair	Christopher Lynch	Comment noted.

10	DEC PERMIT REQUIREMENTS		
10.1	It would "be inconsistent with applicable State wetland strategies." Id. See New York ECL Article 24; 6 NYCRR Part 663; 2016 NYS Open Space Conservation Plan, fn 2, supra.	Big Cedar Swamp Coalition	A state wetlands permit will be required for the proposed project. The purpose of the permitting process is to make sure all state requirements are met prior to the issuance of a permit.
10.2	DEC guidelines on compensatory wetlands mitigation, state impacts can only be contemplated when "the economic or social need outweighs the losses" and when the destruction cannot be avoided. Has it already been determined that a "compelling social or economic need" to fill the wetlands been established?	Travis Whitehead, Christopher Lynch	The current document has been prepared to comply with federal NEPA requirements. General Responses #1 and #2 provide additional information on the need for the proposed project. State reviews associated with a SEQR EIS and the wetlands permitting process will be done in conjunction with design of the project. All state guidelines and requirements will be met during these processes.
10.3	DEC wants mitigation to be "in kind", and same site where ever possible. Other than another marl fen, there is no "in-type" or "on-site" mitigation, they are unique.	Christopher Lynch	Based on a meeting held with the County, NYSDEC, ACOE, and FAA in February 2016 (see Appendix W, Agency meetings), NYSDEC agreed to the consideration of off airport wetland mitigation for non marl fen areas to comply with FAA AC 150/5200-33B, <i>Hazardous Wildlife Attractants on or Near Airports</i> .
10.4	It is my assertion that this project is clearly illegal, and breeches NYS Guidelines on the protection and restoration of vital wetlands.	Christopher Lynch	Comment noted.
10.5	To devastate the environment like is being done out by the airport including filling in S1 wetlands without sound reasoning and a clear human benefit clearly violates what the DEC says: Specific Class 1 standards include "...satisfies a compelling economic or social need..."	Mark Westcott	See Response 10.2.
11	ARCHEOLOGICAL RESOURCES		
	No comments on archeological resources received as part of the 2017 public comments.		
12	RUNWAY LENGTH ANALYSIS		
	No comments on the runway length analysis received as part of the 2017 public comments.		
14	GENERAL COMMENTS		
14.1	The proposed action will have a significant environmental impact and an EIS is require due to impacts to the Marl fen and wetlands. The preparation of a federal environmental impact statement ("EIS") under the National Environmental Policy Act ("NEPA"), 42 U.S.C. SS4321, et. Seq., and FAA Order 5050.4B, paragraph 705(f)(3); paragraph 707(g). is required for the action. / Need full environmental review.	Big Cedar Swamp Coalition, Gary Loughrey, Claudia Braymer, Mike McCabe, Mark Westcott	In accordance with FAA Order 5050.4B, 707 (g), <i>"the responsible FAA official will recommend to the approving FAA official issuance of a FONSI or that FAA prepare an EIS. To support either recommendation, the responsible FAA official should either attach the accepted EA to a draft copy of a recommended FONSI or attach a written explanation stating why an EIS is needed."</i> A State SEQR EIS will be prepared for this project in addition to the NEPA document.
14.2	The Warren County BOS has continued to pursue this project by breaking it down into incremental steps, apparently to bypass opposition. They have approved cutting down some 70 acres of trees, then the damage done to the Great Cedar Swamp was extended to another 23 acres. All this was preventable damage to the wetlands on the airport property.	Maureen Lynch	The removal of 70 acres of trees was required to address existing obstructions to the Runway 1 approach. The removal of 23 additional acres of trees is required to address future obstructions when the runway is extended. As shown on Figures 3-5 and 3-5A the past tree removal and the proposed tree removal does not take place within the limits of the Northern White Cedar Swamp. Tree removal within wetlands does change the wetland from a forested to a shrub-scrub wetland but does not require any fill activities.
14.3	If the airport is challenged to provide adequate service for B-II jets, why has the number of based jets risen from 2 to 5 in the past 2 years?	Travis Whitehead	The new jets based at the airport include a Falcon 900EX, Gulfstream 150, and Challenger 300. The addition of these jets to the based aircraft fleet mix does not negate the fact that these aircraft require additional runway length in order to operate at MTOW as documented in the revised purpose and need (see General Response #1).

14.4	What is the basis for the figures \$2108 and \$6008 and the additional 30% multiplier?	Travis Whitehead	The \$2,108 was an average cost estimate to charter a flight as provided by the FBO. The \$6,008 is based on the FBO adding a 2.85 multiplier because it was estimated there were 2 additional flights diverted/cancelled for every known flight diverted/cancelled (see Appendix A, pages A-9).
14.5	The latest report I have from the Treasurer is that over \$2 Million has been paid to C&S Engineers. What is the present total?	Travis Whitehead	Not related to the EA, no response required.
14.6	I ask why the 3 projects at Runway 1 end since 2006 should not be considered an illegal segmentation under NEPA and SEQR?	Travis Whitehead	According to 6 CRR-NY 617.2, "Segmentation means the division of the environmental review of an action such that various activities or stages are addressed under this Part as though they were independent, unrelated activities, needing individual determinations of significance ". According to 40 CFR § 1508.25 connected actions "are closely related and therefore should be discussed in the same impact statement...if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification." Each of the projects referenced would be considered independent stand alone projects that are not dependent on the each other for the next project to take place, nor do they depend on the runway extension action for their justification. The The Runway 1 RSA project was to bring the existing RSA into compliance with federal design standards, the obstruction removal project was to address obstructions that were identified to the existing runway, while the runway extension project is related to providing adequate runway length to accommodate the existing and future operations by the family of critical design airplanes/aircraft.
14.7	The wildlife hazards section (page 4-18) states no wildlife hazard concerns were raised by DEC .However, in prior discussions, DEC raised the concern for waterfowl strikes, given the current open water, grassy conditions. As noted in meetings with DEC, this concern might be lessened by removal of the on-site beaver dam(s), which in turn may also help to restore historic fen area	NYS DEC	The text on page 4-18 has been revised to include the concerns raised by the NYSDEC in the Final EA.
14.8	General (In 5, para 1.01-1) after "surrounding areas) recommend add: "and as an important component of the National System of Airports." Rational: I believe this airport provides a key transportation node for disaster relief. This networked connectivity is a principal reason the federal government is willing to fund improvements to GA airports like ours	Harrison Freer	Comment noted.
14.9	Floyd Bennett/Warren County, is the logical choice to spend the primarily federal dollars to sustain the overall system in our area, and provides a vital link in the event of disaster relief and support	Harrison Freer	Comment noted.
14.10	If the experts at the FAA are not directing Warren County to expand the runway then the taxpayers need to rely on the FAA to hold the local authorities accountable and get this right.	Mark Westcott	Comment noted.
14.11	No FAA mandate to increase the runway length.	John Currie, Ava Ashendorff, Mark Wescott, Rachel Seeber, Claudia Braymer, Jane LaBombard	Comment noted.
14.12	The environmental impact of the extension will not be offset by either improved safety of the airport or increased economic activity of the Warren County area	Stuart Field	Comment noted.

15	ALTERNATIVES		
15.1	Will the reasons that Alternative 4 was earlier rejected as the "preferred alternative", including the addition of a "stop line" be included in the present analysis where it has now become the preferred alternative?	Travis Whitehead	The FAA requested that further analysis be done to determine if it was feasible to relocate the glideslope antenna on the east side of the runway and provided additional funding to perform this work in 2015. Chapter 2, Section 2.02-4 states "a glideslope evaluation was completed by Thales Air Traffic Management in January 2016 (see Appendix T). The evaluation determined "the glide slope signal will fully comply with Category I tolerances". The glide slope evaluation was then submitted to the FAA Flight Procedures Office for review. Based on FAA review and the incorporation of some project modifications (i.e., locating hold line outside FAR Part 77 primary surface, locating glideslope building and antenna outside the glideslope critical area, and removing a portion of Taxiway E to the Runway 1 end), the glideslope antenna on the east side of the runway is feasible".
15.2	Why has Alternative 1, "no build", which clearly has the lowest costs and least environmental damages not been seriously considered?	Travis Whitehead	As stated in Chapter 1, Section 1.03 the purpose and need is to provide adequate runway length to accommodate the family of critical design airplanes/aircraft currently operating at the airport and those anticipated to operate at the airport in the next five years while ensuring requisite runway safety areas (RSAs). Alternative 1 does not meet the purpose and need for the project since there would be no runway extension with this alternative. This alternative was retained for further evaluation in the EA to comply with CEQ Regulations.
15.3	Alternative 1 avoids all costs and environmental concerns and leaves no "compelling social or economic need" to be satisfied. Would to the "extend practicable" include requiring an intermediate fuel stop for a small (but never estimated) number of flights of exceptionally long duration? Might it be practicable to utilize the 8500 ft. runway of a fully staffed airport just 10 minutes distant? Alternative 1 has not been seriously considered	Travis Whitehead	Comment noted. Chapter 4, Section 2.03-1 documents that the No-Action Alternative (Alternative 1) does not meet the purpose and need of the proposed project.
15.4	Alternative 4, the present "preferred alternative" was rejected in the last draft due to the significant up-front costs for design and modeling of the ILS in order to determine if the approach is feasible, requires relocation of the glide slope antenna/building, requires a runway taxiway separation of 400 feet to accommodate the glide slope antenna/building, operational challenges on airfield due to placement of hold lines on the taxiway to maintain a glide slope critical area clear of objects, and no guarantee the FAA will approve.	Travis Whitehead	That is correct, Alternative 4 was ruled out in a prior version of the EA. Alternative 3 was the preferred alternative (maintained glide slope antenna on west side of runway). However, this would require filling the 0.9 acre marl fen. Based on numerous meetings held with the NYSDEC and concerns they had with impacting the 0.9 acre marl fen area, Alternative 4 was reconsidered. As part of this, the FAA wanted to make sure that this alternative was feasible (as you identified, there were concerns about whether the glide slope antenna on the east side of the runway would be operational or have issues). In order to determine if this alternative was feasible, the FAA provided additional funding to conduct a glide slope analysis and a reimbursable agreement between the County and FAA flight procedures office (FPO) for review of the glide slope. As discussed in Chapter 4, Section 2.02-4 based on the results of the glide slope analysis and FAA FPO review the glide slope on the east side of the runway is feasible with the incorporation of some project modifications. These modifications were incorporated into the preferred alternative (i.e., located of the hold line outside the FAR Part 77 primary surface, locating the glide slope building and antenna outside the glide slope critical area, and removing a portion of Taixway E).
15.9	If there is, in fact, undisputed Marl Fen at this point, and it can be preserved/protected by only extending the runway 750 feet, I recommend you consider this alternative as well perhaps as Alternative 4A. While some redesign may be required, this will also likely reduce the cost of the overall project and still provide some of the operational benefits	Harrison Freer	Comment noted.

16	APPENDICES DATA		
16.1	Please clarify what "CX" means in the FBO provided "diversion data". Were these flights diverted or cancelled? If cancelled which ones were later completed?	Travis Whitehead	"CX" means these flights were cancelled. As identified in Appendix A, pages A-9 and A-10, the data represents flights that were cancelled or diverted as a result of weather and contaminated runway conditions that did not provide adequate runway length for aircraft to land. There would be no way for the FBO to determine if cancelled flights were completed later.

[THIS PAGE INTENTIONALLY LEFT BLANK]

Floyd Bennett Memorial Airport Environmental Assessment General Responses to Public Comments

1. Purpose and Need

Comments from the public focused on no justified need for the project based on a small percentage of aircraft operations by business jet aircraft, the runway length analysis deficiencies, selection of the 90% useful load versus the 60% useful load for determining the recommended runway length with no length of haul analysis included in the EA, and 6,000-foot runway extension still requires aircraft to operate with weight restrictions.

Need for Proposed Project / Substantial Use Criteria

The following FAA guidance was followed in developing the purpose and need for the project

FAA Order 5090.3C Field Formulation of the National Plan of Integrated Airport Systems (NPIAS) which states "Airport dimensional standards (such as runway length and width, separation standards, surface gradients, etc.) should be selected which are appropriate for the critical aircraft that will make substantial use of the airport in the planning period,"

FAA Advisory Circular (AC) 150/5325-4B, Runway Length Requirements for Airport Design, which states the "design objective for the main primary runway is to provide a runway length for all airplanes that regularly use it without causing operational weight restrictions." According to AC 150/5325-4B, substantial use is the "*critical design airplanes have at least 500 or more annual itinerant operations at the airport (landings and takeoffs are considered as separate operations) for an individual airplane or a family grouping of airplanes*".

The guidance contained in FAA AC 150/5325-4B regarding the design objective for the main primary runway has been incorporated into Chapter 1, Section 1.03 of the Final EA. As documented in Chapter 1, Section 1.03, Table 1-1, B-II aircraft operating at the airport exceed the FAA's substantial use threshold. Therefore, this family of aircraft was evaluated based on their runway lengths for takeoff and landing.

Runway Length Deficiencies

As identified in AC 150/5325-4B, Step 2: *Identify the airplanes that will require the longest runway lengths at maximum certificated takeoff weight (MTOW). This will be used to determine the method for establishing the recommended runway length.*

Table 1 identifies the runway lengths for the critical design family of airplanes/aircraft for takeoff and landing operations. In addition, the charter operators like NetJets, Flight Options, and others, are required to comply with Federal Aviation Regulations (FAR) Part 135.385¹ since they provide on-demand operations for compensation or hire. As a result, the Part 135 landing lengths for dry and wet pavement conditions are included in **Table 1**.

¹ http://www.ecfr.gov/cgi-bin/text-idx?SID=339bb527fbf1fd945ba56a23591fdb55&mc=true&node=se14.3.135_1385&rgn=div8

**TABLE 1
RUNWAY LENGTHS FOR CRITICAL FAMILY OF AIRPLANES / AIRCRAFT**

Aircraft Type	75% or 100% of Fleet	MTOW (lbs.)	Takeoff Lengths	Landing Lengths	Part 135 Landing Lengths	
			Takeoff	Landing	Dry 60% (x1.67)	Wet (x1.97)
Bombardier Challenger 300 ¹	75%	38,500	4,927	2,600	4,342	5,122
Cessna Citation II	75%	14,800	3,655	2,078	3,470	4,094
Cessna Citation V	75%	16,630	3,257	2,230	3,724	4,393
C650 - Cessna III/VI/VII	75%	22,000	5,242	2,388	3,988	4,704
Cessna CitationJet CJ2	75%	12,500	3,520	2,619	4,374	5,159
Cessna CitationJet CJ3	Note listed in table	13,870	3,274	2,411	4,026	4,750
Cessna CitationJet CJ4	Note listed in table	17,110	3,242	2,700	4,509	5,319
Cessna Citation Excel	75%	16,830	3,721	2,909	4,858	5,731
Citation Sovereign	75%	30,300	3,719	2,201	3,676	4,336
Dassault Falcon 20	75%	28,660	5,344	2,570	4,292	5,063
Dassault Falcon 50	75%	39,700	4,844	2,150	2,591	4,236
Dassault Falcon 501	75%	36,500	5,413	2,175	3,632	4,285
Dassault Falcon 2000	100%	40,780	6,000	3,325	5,600	6,400
Dassault Falcon 900 ¹	100%	49,000	5,700	3,725	6,200	7,200
Raytheon Hawker 800 ¹	100%	28,000	5,400	2,700	4,500	5,200

Note: 1 denotes based aircraft

Source: 75% of fleet data from JetAdvisors.com or jetav.com (takeoff interpolated for airport elevation of 300' MSL, MTOW, ISA - 59°F); 100% of fleet taken from airplane flight manuals (airport elevation of 328' MSL, MGTW, 77°F, see Appendix F)

Table 1 identifies in red the aircraft that do not have adequate runway length for takeoff at maximum gross takeoff weight (MTOW) thus requiring operational weight restrictions to operate on the existing 5,000 foot runway. The table also identifies in red the aircraft that do not have adequate runway length for landing at maximum landing weight (MLW) on dry / wet runways. The analysis of runway length and tables contained in this response have been incorporated into Chapter 1, Section 1.03 of the Final EA.

Length of Haul

An evaluation of length of haul for the family of critical design airplanes/aircraft was conducted using FlightAware data from December 2015-December 2016 (see Appendix B of the Final EA). Based on a review of the data, 27% (156 operations / 580 total operations) of the family of critical design airplanes/aircraft have haul lengths greater than 500 nautical miles (see **Table 2** and **Appendix B**). As a result, the 90% useful load factor was selected. The table and analysis has been incorporated into the Chapter 1, Section 1.03 of the Final EA.

**TABLE 2
LENGTH OF HAUL FOR FAMILY OF CRITICAL DESIGN AIRPLANES / AIRCRAFT**

Aircraft Type	Length of Haul			
	< 500 NM	500 - 1,000 NM	1,000 - 1,500 NM	> 1,500 NM
Bombardier Challenger 300 ¹	53	6	13	3
Cessna Citation CJ2	21	9	2	0
Cessna Citation CJ4	10	0	0	0
Cessna Citation Excel	103	12	3	0
Cessna Citation II	2	8	0	0
Cessna Citation III	11	1	0	0
Cessna Citation Sovereign	23	9	0	1
Cessna Citation V	17	3	4	0
Dassault Falcon 20	4	3	3	0
Dassault Falcon 50	0	0	0	1
Dassault Falcon 2000	15	13	0	2
Dassault Falcon 900 ¹	10	3	1	0
Raytheon Hawker 800 ¹	155	14	38	4
Total	424	81	64	11

Note: 1 denotes based aircraft

Source: Flight aware data, December 2015-December 2016 (see Appendix B)

Recommended Runway Length of 6,000 feet is still inadequate

Based on the information included in **Table 1**, a runway length of 6,000 feet will provide adequate runway length for takeoff to accommodate the family of critical design airplanes/aircraft currently operating at the airport and those anticipated to operate at the airport in the next five years. The Falcon 2000 and Falcon 900 do not have adequate runway length for landing at maximum landing weight (MLW) under Part 135 regulations, and may need to operate under weight restrictions. However, the 6,000-foot runway will accommodate 96% of landing operations for the family of critical design airplanes/aircraft currently operating at the airport as documented in **Tables 1 and 2**. This text has been incorporated into Chapter 1, Section 1.03 of the Final EA.

FAA Approval of Draft EA

In accordance with FAA AC 150/5325-4B the responsible FAA officials have reviewed the Draft Environmental Assessment and purpose and need in compliance with Section 707 (b) which states “*The responsible FAA official must independently evaluate the EA to: (1) Determine the EA’s accuracy. (2) Take full responsibility for the scope and content that addresses FAA actions. (3) Determine if the EA meets the requirements of NEPA, applicable special purpose laws, and this Order, including responses to public comments... (4) Help ensure the necessary agency review and consultation has occurred and that the EA adequately addresses their comments and concerns.*” After receiving FAA approval on the EA document it was made available to the public.

2. Safety

Comments regarding safety focused on the belief that all safety issues at the airport have been addressed (i.e., the Runway 1 RSA improvement project and the 2014 Runway 1 obstruction removal project), and the proposed runway extension is not a safety related project (e.g., not a need but a want).

The current runway length of 5,000 feet is adequate to accommodate the existing small general aviation aircraft and private business jets operating at the airport. However, the charter aircraft operations by NetJets, Flight Options, and other on-demand operations for compensation or hire at the airport have safety measures that they need to take into consideration to mitigate the risk of runway overruns during landing. These safety measures are identified in FAA advisory circulars and Safety Alert for Operators (SAFOs).

FAA AC 91-79A, *Mitigating the Risks of a Runway Overrun Upon Landing*, provides guidance to pilots and flight crews, airplane operators, certificate holders and states that these operators “*should adopt the recommended procedures found in this AC to enhance awareness of the risks inherent during the landing phase of flight and the mitigations to employ to reduce the risk of a runway landing overrun*”.

Based on a study of FAA and NTSB data the AC identifies hazards that increase the risk of a runway overrun (i.e., unstabilized approach, high airport elevation or high-density altitude, effect of excess airspeed over the runway threshold, airplane landing weight, landing beyond the touchdown point, downhill runway slope, excessive height over the runway threshold, delayed use of deceleration devices, landing with a tailwind, a wet or contaminated runway).

The Floyd Bennett Memorial Airport had 152 days of precipitation in 2016 based on the Weather Underground Annual Records. As a result, the landing distances required during wet or contaminated runway conditions is an important consideration for jet aircraft operators. As noted in AC 91-79A, landing distances in the manufacturer-supplied airplane flight manual (AFM) *provide performance in a flight test environment that is not necessarily representative of normal flight operations. For those operators conducting operations in accordance with specific FAA performance regulations, the operating regulations require the AFM landing distances to be factored to ensure compliance with the pre-departure landing distance regulations...Pilots and operators should also account for runway conditions at the time of arrival (TOA) to ensure the safety of the landing*”

AC 91-79A defines the factored landing distance for applicable operations (i.e., Part 135) as “*the dispatch landing distance allows the airplane to land and stop within 60 percent of the available runway when the runway is dry. The factored landing distance is the certified landing distance multiplied by 1.67, which can then be compared directly to the available landing distance. When the runway is wet, the certified distance is multiplied by 1.97 to account for the 15 percent additional runway requirement.) A safety margin of 15 percent should be added, and the resulting distance should be within the runway length available. The FAA considers a 15 percent margin to be the minimum acceptable safety margin.*”

In addition to the FAA advisory circular, the FAA has issued a Safety Alert for Operators (SAFO) 06012 *Landing Performance Assessments at Time of Arrival (Turbojets)*.

“*A SAFO contains important safety information and may include recommended action. SAFO content should be especially valuable to air carriers in meeting their statutory duty to provide service with the highest possible degree of safety in the public interest.*”

This SAFO urgently recommends that operators of turbojet airplanes develop procedures for flight crews to assess landing performance based on conditions actually existing at time of arrival, as distinct from conditions presumed at time of dispatch. Those conditions include weather, runway conditions, the airplane's weight, and braking systems to be used. Once the actual landing distance is determined an additional safety margin of at least 15% should be added to that distance. Except under emergency conditions flight crews should not attempt to land on runways that do not meet the assessment criteria and safety margins as specified in this SAFO.

This SAFO applies to all turbojet operators under Title 14 of the Code of Federal Regulations (14 CFR) parts 121, 135, 125, and 91 subpart K. The intent of providing this information is to assist operators in developing methods of ensuring that sufficient landing distance exists to safely make a full stop landing with an acceptable safety margin on the runway to be used, in the conditions existing at the time of arrival, and with the deceleration means and airplane configuration that will be used. The FAA considers a 15% margin between the expected actual airplane landing distance and the landing distance available at the time of arrival as the minimum acceptable safety margin for normal operations."

3. Economic Benefits

Comments regarding the economic benefits associated with the proposed runway extension focused on the EA Report not containing factual statistics that the airport generated any dollar amount of economic activity, and not seeing the economic benefits to the local community associated with the runway extension.

In order to address public concerns, the Economic Development Corporation of Warren County (EDC) had a Preliminary Economic Assessment completed in 2014 and an Economic Impact Assessment completed in 2016 by R.A. Wiedemann & Associates, Inc. (these reports have been included in Appendix Y of the Final EA). The studies identified economic benefits based on existing airport operations and projected future benefits.

Existing airport economic benefits included:

1. Airport has attracted businesses to the area / provides services to local businesses. Examples that were given include the following:
 - two local companies, Hacker Boat Company and Melvina Can Machinery Company cited the Airport as a reason for locating and/or expanding their business in Glens Falls
 - the fixed base operator, Rich Schermerhorn has invested \$3 million in the Airport since 2006, and planned an additional \$625,000 investment in 2015
 - D.A. Collins, Inc. has its headquarters in Wilton, NY and has a land lease at the Floyd Bennett Memorial Airport with a hangar for multiple company owned planes for business purposes
 - clientele to the Sagamore Resort on Lake George regularly use the airport to arrive and depart from the area.
2. Direct spending related to the airport. Examples that were given include the following:
 - Employing 16 full time and seven-part time employees
 - Airport construction activity – employing construction workers
 - Airport operational activity – fuel sales, aircraft maintenance, aircraft storage
 - Airport-related business spending – tourism travel, hotel accommodations, rental cars, restaurant sales

Economic benefits associated with the proposed runway extension

The economic benefits associated with the proposed runway extension were developed and based on IMPLAN economic modeling system (a scientific model that is used industry wide) that included:

- Floyd Bennett Memorial Airport supports 97 jobs and \$10 million in annual economic impact. The Airport generates \$478,400 in State and local taxes and provides incomes of more than \$4.3 million to New York residents.
- Local tax benefits (i.e., sales tax, payroll taxes, aviation fuel tax, public accommodations tax) were identified. Based on the analysis and a proposed project cost of \$8.72 million it was estimated that Warren County would receive \$181,672 in sales taxes and property taxes (or 45 percent of the local share of the project (\$400,000)).

4. Project Costs

Comments regarding the project costs focused on the project costs were underestimated and didn't include all costs in the estimate (i.e., cost of grading, wetland mitigation, land acquisition, studies, and engineering) and taxpayers should have an accurate understanding of the return on investment (ROI), cost estimates are old and outdated with different costs referenced in the report (i.e., \$8 million and 10.5 million), and the fact that the airport currently operates at an \$800,000 loss and why would the FAA provide additional funding when FAA policy is for an airport to be self-sustaining.

Project Costs underestimated / don't include all costs in estimate / ROI should be prepared

As documented in Chapter 2, Table 2-2, the notes at the bottom of the table document what is included in the project cost estimates. The construction cost estimates include construction costs, engineering, construction inspection, and an FAA reimbursable agreement. The wetland costs include costs for wetlands creation, design, monitoring, and engineering fees. Land acquisition costs associated with off-site wetland creation are not included since specific sites have not been identified at this time.

In regards to the ROI, the FAA does require a benefit cost analysis (BCA) for certain airport projects which would be similar to an ROI. In FAA Order 5100.38D, Airport Improvement Program Handbook, 3-15. ... A BCA is a tool to determine if a project's benefits outweigh its costs. It is FAA policy that, as of October 28, 2011, a BCA is only required if the sponsor is requesting more than \$10 million in discretionary funding over the life of the project. The proposed runway extension project at the airport does not exceed the \$10 million in discretionary funding, and the FAA did not require a BCA to be completed.

Project costs outdated / different cost estimates contained in the report and appendices

Project costs contained in Chapter 2, Table 2-2 have been updated to reflect current 2017 dollars for construction and a \$66,500/acre cost for wetlands creation at a ratio of 2.8:1 for regulated wetlands mitigation based on NYSDEC comments received on the February 2017 Draft EA (see Appendix X). These cost estimates were also provided to the FAA for the design grant application for the runway extension project.

The difference in cost estimates is related to costs in the EA Report (\$8 million) being different than costs contained in the appendices documentation. Specifically, the total cost with payback table contained in Appendix A, page A-10 showed a project cost of \$10.5 million. This project cost as shown in the table was based on 2013 cost estimates. The EA project has been ongoing since 2010 and there have been updates to the project costs since then as a result of the proposed project limits, wetland impacts, and grading limits changing. As stated above, the current project costs are shown in the Final EA.

FAA policy for airport to be self-sustaining why are they spending money on an airport that operates at a deficit, shouldn't the airport be self-sustaining first?

The FAA policy for an airport to be self-sustaining is contained in FAA Order 5190.6B, FAA Airport Compliance Manual in Chapter 17, Sections 17.5, 17.6, and 17.7. These sections identify the "*purpose of the self-sustaining rule is to maintain the utility of the federal investment in the airport... and recognizes that individual airports differ in their ability to be fully self-sustaining... a fee and rental structure is to be geared to making the airport as financially self-sustaining as possible, however, market conditions may*

not permit a sponsor to establish fees that are high enough to recover costs and sufficiently low to attract and retain commercial aeronautical services. In those cases,” the long term goal of the sponsor is to make the airport as financially self-sustaining as possible”.

According to the FAA Airport Sponsor & Airport User Rights and Responsibilities, “The FAA Compliance Program is designed to ensure the availability of a national system of safe, properly-maintained, public-use airports operated in a manner consistent with the airport owner’s Federal obligations and the public’s investment in civil aviation. The Airport Compliance Program does not control or direct the operation of the airports; rather it monitors the administration of valuable rights pledged by airport sponsors to the people of the United States in exchange for monetary grants to ensure that the public interest is being served.”

17.5. Self-sustaining Principle. Airports must maintain a fee and rental structure that makes the airport as financially self-sustaining as possible under the particular circumstances at that airport. The requirement recognizes that individual airports will differ in their ability to be fully self-sustaining, given differences in conditions at each airport. The purpose of the self-sustaining rule is to maintain the utility of the federal investment in the airport.

17.6. Airport Circumstances. At some airports, market conditions may not permit a sponsor to establish fees that are sufficiently high to recover aeronautical costs and sufficiently low to attract and retain commercial aeronautical services. In such circumstances, a sponsor's decision to charge rates that are below those needed to achieve self-sustainability in order to assure that services are provided to the public is not inherently inconsistent with the federal obligation to make the airport as self-sustaining as possible given its particular circumstances.

17.7. Long-term Approach. If market conditions or demand for air service do not permit the airport to be financially self-sustaining, the sponsor should establish long-term goals and targets to make the airport as financially self-sustaining as possible.

As a result, the airport’s ability to be self-sustaining does not dictate whether they will receive funding for projects from the FAA.

5. Wetlands / Marl Fen Impacts

Comments from the public focused on there being no evidence that a new marl fen can be created, vague mitigation measures, and impacts to the marl fen related to surface water runoff and hydrology.

No evidence that a Marl Fen can be created

Email communications were held between the NYSDEC, ACOE, and the wetland consultant (McFarland Johnson) from February – March of 2016 (see Appendix I). As a part of these communications the NYSDEC asked if there were any examples of marl fen creation. The wetland consultant identified that Dr. Leopold of SUNY ESF and several of his past graduate students have conducted studies regarding marl fen creation/restoration at the Former Solvay Waste Beds, located adjacent to Onondaga Lake in Syracuse, NY and the Great Swamp in Canastota with positive results.

Vague Mitigation Measures

NYSDEC and USACE do not discuss what constitutes acceptable wetland mitigation for wetland permits prior to application receipt and review (See page I-93 of the EA). However, based on the results of numerous meetings and email communications that took place with the NYSDEC and ACOE (see Appendix W, Agency Meetings and Appendix I), some conceptual measures were recommended to address NEPA requirements and are identified in Chapter 4, Sections 4.05 and 4.06 of the EA. Marl fen mitigation measures were developed based on these communications that included creating new marl fen areas, draining the area beyond the runway safety area to reduce water levels to possibly facilitate development of additional marl fen, removal of several beaver dams that have caused prolonged flooding to the marl fen community which if removed may also provide an opportunity for other flooded areas within Wetland A to assume Marl fen community like attributes, and enhancing other state recognized marl fen areas.

In regards to the remaining wetland impacts, wetland creation is recommended to compensate for the loss of these wetlands as identified in Chapter 4, Section 4.06. Some initial wetland creation sites were identified that would comply with state requirements. However, based on the results of a meeting held in February 2016 between the County, NYSDEC, ACOE, and FAA; the NYSDEC agreed to consider additional wetland mitigation sites that are located 10,000 feet away from the airport to comply with FAA AC 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports (see Appendix W, Agency Meetings). As a result, further sites will be evaluated during the project design, permitting, and mitigation phase. The additional mitigation measures identified during construction activities are standard practices that are taken for each project to minimize impacts to wetlands. More detailed measures will be identified as part of the permitting process.

Surface Water Runoff

Deicing Impacts

There are no known harmful substances that are expected to runoff the runway surface. The airport does not use any liquid deicing chemicals on the airport pavements. The airport rarely uses solid runway deicer NAAC on the Runway 1-19. Maybe one ton per year at most. The airport used none last season. The product data sheet can be found here: <http://www.cryotech.com/cryotech-naac-runway-environmental-safety>

The FBO only uses Type I deicing fluid on the terminal apron. This fluid is heated, sprayed on and melts snow and ice from the aircraft (propylene glycol). This fluid has the same approximate viscosity as water and does not stick to the aircraft. This activity takes place only on the main terminal apron and the storm water outfall for this SPEDES permitted industrial activity is next to the fuel farm which is downstream of the Marl Fen. This outfall is not near the project site. Type 4 deicing fluid (gel like) is not used at the airport which would have the tendency to slide off aircraft surfaces traveling down the runway and taxiways.

De-icing chemicals are not expected to impact the environment as discussed above. Larger aircraft are not expected to use the runway. No new or additional heavy equipment will be brought in to maintain the additional runway length. The airport will use existing airport maintenance equipment and the additional runway length will not contribute significantly to the duration required to maintain the surface. The airport maintenance equipment is in good repair and does not leak fluids or chemicals.

Construction Impacts

Grading, construction work and vegetation removal can in-fact impact surface hydrology. The Clean Water Act states that storm water discharges from certain construction activities to waters of the United States are unlawful unless authorized by a National Pollutant Discharge Elimination System (NPDES) permit. In New York State, the New York State Department of Environmental Conservation (NYSDEC) administers the NPDES permits through the State Pollution Discharge Elimination System (SPDES) program. The principal objective of a Stormwater Pollution Prevention Plan (SWPPP) is to comply with the SPDES storm water permit for construction activities by planning and implementing soil erosion and sediment control practices. According to the SPDES General Permit No. GP-0-15-002, dated January 29, 2015 and effective through January 28, 2020, construction sites or common plans of development that result in disturbance of one or more acres are subject to permitting requirements. The total site disturbance is greater than one acre, therefore a SWPPP will be required. All necessary soil erosion control practices identified in the SWPPP will be incorporated into the construction project. The SWPPP includes requirements for both water quality and quantity. Stormwater management devices are expected to be constructed which capture and treat the stormwater prior to discharge. One standard water quality practice which would be considered for this project is the dry swale which will be installed in turf infield areas receiving runoff from paved areas of the project. Others will be developed during the design process and implemented as required.

In addition to obtaining a SWPPP for the runway extension project, a groundwater/hydrology study will be conducted to address public and NYSDEC concerns in regards to potential impacts construction activities could have on the 0.9 acre marl fen community. Chapter 4, Section 4.05, of the Final EA has been revised and now states that *a study of groundwater/hydrology will be conducted during the project design phase.*