



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

January 9, 2015

Mr. Craig Tackabery  
Marin County Department of Public Works  
P.O. Box 4186  
San Rafael, California 94913-4186

**Subject: Gness Field Airport Runway Extension Project and FAA Environmental Impact Statement**

Dear Mr. Tackabery:

On December 18 and December 22, 2014, Marin County and San Francisco Airports District Office (SFO ADO) representatives discussed the next steps for the Gness Field Airport runway extension project Environmental Impact Statement (EIS) and Record of Decision (ROD). You explained Marin County wants to schedule a “merits hearing” for your Board of Supervisors to consider the project’s approval. You also explained when a County project is associated with a federal EIS, the County typically waits for a federal agency to issue a ROD before the County conducts a merits hearing. As the FAA has not yet issued a ROD on the EIS, you requested we update you on the status and actions required to complete the federal EIS and issue a ROD.

We share your desire to proceed with the evaluation of the proposed project as quickly as possible. The FAA issued its Final EIS for the *Gness Field Airport, Proposed Extension of Runway 13/31* in June 2014. We received two comment letters on the Final EIS. One of the letters challenged the runway length calculation for the proposed runway extension.

The FAA had anticipated we would issue a ROD on the EIS for the project in Fall 2014. However, the FAA must evaluate proposed aviation development based on a current, FAA approved, aviation forecast. This ensures the FAA’s decisions regarding proposed aviation development are based on the appropriate airport design standards and project justification associated with a current aviation forecast.

As part of our review of the comment letters on the Final EIS, we informally evaluated recent aircraft flight plan data for Gness Field Airport. Our evaluation of that data suggests that aviation activity and the critical aircraft at Gness Field Airport may have changed since the FAA approved the Gness Field Airport aviation forecast in 2009. Therefore, the FAA will require a current aviation forecast, including determination of the critical aircraft and runway length determination, before proceeding further with the EIS.

As a current aviation forecast will produce new information that must be incorporated into the EIS before the FAA proceeds with a ROD, a Supplemental Final EIS will be required for this project. Contractual and financial options for both a current aviation forecast and a Supplemental Final EIS area described below.

We have identified two contractual options available to Marin County to complete a current aviation forecast.

1. Marin County could complete this work as part of the scope of Airport Improvement Program grant 3-06-0167-016-2014 (AIP 16) issued in September 2014 to update the Airport Layout Plan with Narrative and Conduct Aeronautical Survey. This would require that Marin County complete its consultant selection, fee negotiation, and submit the results of that cost reasonableness determination to the FAA, before that effort could proceed.
2. Alternatively, Marin County could complete this work by issuing an additional scope of work to the Environmental Impact Statement consultant, Landrum and Brown, conduct a fee negotiation, and submit the results of that cost reasonableness determination to the FAA before that effort could proceed

In either case, the FAA can work with Marin County to ensure that the scope of work addresses the specific requirements to prepare a current aviation forecast, critical aircraft determination, and, if necessary, an additional runway length analysis.

We have identified five options Marin County could use to fund the aviation forecast work.

1. Marin County seeks reimbursement for the work as part of AIP 16.
2. Marin County could propose to use remaining funds in the EIS grant AIP 15 to prepare these items if those funds are sufficient to complete the work. However, funds in AIP 15 are nearly expended, and this 2011 grant must be closed no later than June 30, 2015, and preferably closed by March 30, 2015.
3. Marin County could use County funds to pay for this work now, and apply for FAA funds later to seek reimbursement for this work with entitlement funds as part of plan formulation in a subsequent AIP grant.
4. Marin County could include this work as part of the scope of work to be included in a new 2015 AIP grant application to complete the Supplemental Final EIS for this project, and wait to receive and accept a grant offer before proceeding with the work.
5. Marin County could complete this work with County funds.

As discussed above, as the new aviation forecast would be new information, it must be disclosed during the National Environmental Policy Act process in a Supplemental Final EIS. Other items may be required in the Supplemental EIS depending on the information in the new aviation forecast. Marin County and the FAA will not be able to finalize the specific scope of work, cost estimate, or schedule to complete the Supplemental Final EIS or issue a ROD, until the aviation forecast, critical aircraft determination, and runway length determination are completed.

The Supplemental Final EIS must be prepared by the EIS consultant previously selected by the FAA, Landrum and Brown.

We can identify three options to pay for the Supplemental Final EIS work.

1. Marin County could use County funds to pay for this work now, and apply for FAA funds later to seek reimbursement for this work with entitlement funds as part of plan formulation in a subsequent AIP grant.
2. Marin County could apply for a 2015 AIP grant to complete the Supplemental Final EIS, and wait until grant was issued before starting work on a Supplemental Final EIS.
3. Marin County could use County funds to pay for the work and not seek reimbursement from an AIP grant.

We share Marin County's desire to complete the EIS process as soon as possible. We also understand Marin County's desire to proceed to a merits hearing regarding the runway extension project as quickly as possible. Our past experience in similar situations is that the Supplemental Final EIS will take between 12 to 18 months to complete once we have an FAA-approved aviation forecast for the proposed runway extension project. However, we will make all efforts to expedite our process so as to complete the Supplemental Final EIS within 12 months of FAA approval of the aviation forecast. The FAA can issue a ROD once 30 days have elapsed after the issuance of a Supplemental Final EIS.

If you have any questions regarding this matter please contact me at 650-827-7601 or e-mail [dave.cushing@faa.gov](mailto:dave.cushing@faa.gov). You may also contact Doug Pomeroy, environmental protection specialist of my staff at 650-827-7612, or email at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov).

Sincerely,



David F. Cushing  
Acting Manager