

APPENDIX B: PUBLIC AND AGENCY COMMENTS ON THE FINAL EIS

THIS PAGE INTENTIONALLY LEFT BLANK

APPENDIX B

PUBLIC AND AGENCY COMMENTS ON THE FINAL EIS

B.1 Reader's Guide

HOW IS THIS APPENDIX ORGANIZED?

The Response to Comments contains three main sections. The first section, Section 1, provides a brief introduction and an overall summary of the process of soliciting, receiving, and evaluating comments on the Final Environmental Impact Statement (FEIS). Section 1 also includes a table to assist the reader in finding specific comment letters, facsimiles, and e-mails (henceforth, collectively referred to as comment letters). Table B-1 contains a listing of the comment letters received on the FEIS. Each comment letter received was assigned an alphanumeric identification code. Additional information in Table B-1 includes the name of the applicable organization or individual, address, date of receipt, and a listing of substantive comments identified for each comment letter. Section 2 of this appendix contains copies of letters from Federal, State, and local agencies. Section 3 contains a summary table of all comments arranged by commentor and comment number and the Federal Aviation Administration (FAA) response to each comment. Please, note that this third section responds to substantive comments in all the letters received, not just the comment letters found in Section 2.

HOW DO I KNOW THE FAA RECEIVED MY LETTER?

All letters, email, and other comment correspondence received by the FAA during the comment period for the FEIS are listed in Table B-1. If your name or the name of your organization appears in Table B-1, your letter was received. This table can be used to find your name (or organization's name), the identification number of your letter, and the comments that received responses.

HOW DO I FIND MY COMMENT?

A specific comment letter can be located by looking up the name of the author(s) or commenting organization in Table B-1. The associated comments and responses for that letter can be found in Table B-2 of Section 3 under the author's or organization's name and by comment number.

WHAT WAS THE RESPONSE TO MY COMMENT?

FAA responses to the identified comments are grouped by the name of the commentor or commenting organization in Table B-2 of Section 3.

HOW DO I FIND WHAT COMMENTS ANOTHER INDIVIDUAL, GROUP, ORGANIZATION HAD?

Table B-1 of Section 2 lists all individuals, groups, and organizations from whom the FAA received comments. Table B-2 of Section 3 contains a summary of all substantive comments received on the FEIS. These comments, and the associated responses, are organized according to the name of the commentor or commenting organization. Simply scroll through the table to find the name of the individual, group, or organization whose comment(s) you wish to review.

B.2 Public Comment Summary

The main function of this appendix is to provide a record of public and agency comments received on the FES and the FAA's response to those comments. The following discussion explains how the comments were solicited on the FIS and how those comments were processed. A detailed list of persons, organizations, or agencies submitting comments on the FIS is presented in this section. The Reader's Guide at the front of this appendix has also been provided to assist the reader in understanding how to find their comments and the agency responses to their comments.

The processing of comments on the FES that were used in the consideration of decisions contained in the Record of Decision followed the mandates of the National Environmental Policy Act (NEPA) (1969, as amended) and a process established by the Council on Environmental Quality (CEQ) regulations, which provide that agencies must "(m)ake diligent efforts to involve the public in ... NEPA procedures" (40 CFR 1506.6(a)). Although this appendix deals primarily with the comments received on the FEIS, the reader should also be aware that public involvement preceded the release of the Draft EIS (DEIS) and continued following publication of the DEIS.

PUBLIC AND AGENCY MEETINGS

Preparation of the Record of Decision included soliciting comments from other agencies and the public regarding the content of the FEIS. This solicitation of comment included public and agency meetings. Following the release of the FEIS, the FAA held a public information meeting in Juneau, Alaska on May 14, 2007 to review the key revisions between the DEIS and the FEIS, address questions related to those changes, to provide information to facilitate review of the FEIS, and provide an opportunity for the public to provide comment on those changes and other content of the FEIS. A meeting was held with the cooperating, reviewing, and permitting agencies that same day.

COMMENT PROCEDURE

The Notice of Availability for the FAA's Juneau International Airport Final EIS was published in the Federal Register on April 23, 2007. The public comment period began at that time and extended until June 11, constituting a 48-day comment period.

Recipients of a copy of the FEIS and/or attending the public meeting were given instructions on how to provide comments and where they should be sent. They were advised that comments

should be as specific as possible in terms of adequacy of the FEIS and/or merits of the alternatives discussed.

All comment letters were copied and sent to a third-party consultant where they received an alphanumeric identification code and were placed in the project planning record. The full text of each comment letter or e-mail received from individuals or groups are held in the FAA's Juneau International Airport EIS project files in Anchorage, Alaska, and may be viewed upon request. Letters received from Federal, State, and local agencies are included in Section 2 of this appendix. Comments from each comment letter (or other form of comment) were identified and organized by commentor name. Section 3 of this appendix includes each comment or summary of comments organized by commentor and the associated response to the comment.

Consistent with NEPA regulations (40 CFR 1503.4(b)), this document focuses on substantive comments on the FEIS. Substantive comments include those that challenge the accuracy of information in the FEIS or that offer specific information that may have a bearing on the decision contained in the Record of Decision. Comments that merely express an opinion for or against the proposed action were not identified as a comment requiring a response. In cases where the comment was substantive but appeared to indicate that information in the FEIS was either misunderstood or unclear, a response was prepared to clarify the information. Resource specialists from the third-party consultant prepared draft responses to each substantive comment, which were then reviewed, refined, and approved by FAA personnel and subsequently prepared in the form found in this Record of Decision.

Table B-1 provides an index of agencies, organizations and individuals that commented on the FEIS. It also includes a unique identification number, name of commenter or organization (if applicable), date the comment letter was received by the FAA, and a list of numbered comments contained in the respective letter.

Table B-1. List of Respondents

ID #	Date Received	How received	Name	Organization	City	State	Comments
F-001	05/17/07	Letter	Steve Zimmerman	Juneau Audubon Society	Juneau	AK	F-1 through F-5
F-002	05/25/07	Email	Randal Vigil	U.S. Army Corps of Engineers, Juneau Regulatory Field Office	Juneau	AK	F-6 through F-8
F-003	05/07/07	Email	B. Sachau	N/A	Florham Park	NJ	F-9 through F-62
F-004	06/11/07	Email	Mal Linthwaite	Territorial Sportsmen, Inc.	Juneau	AK	F-63 through F-65
F-005	06/11/07	Email/Letter	Beverly Anderson	Juneau Watershed Partnership	Juneau	AK	F-66 through F-73
F-006	06/11/07	Email/Letter	Mary Irvine	N/A	Juneau	AK	F-74 through F-76
F-007	06/11/07	Email/Letter	Tom Schumacher	Alaska Department of Fish & Game	Juneau	AK	F-77 and F-78
F-008	06/11/07	Email/Letter	Christine Reichgott	U.S. Environmental Protection Agency, Region 10	Seattle	WA	F-79 and F-80

Agency Letters Received on the FEIS



REPLY TO
ATTENTION OF

F-002

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
JUNEAU REGULATORY FIELD OFFICE
8800 GLACIER HWY, SUITE 106
JUNEAU, ALASKA 99801-8079

May 25, 2007

Regulatory Division
POA-1981-320-FF

Ms. Patricia Sullivan
Federal Aviation Administration
Alaskan Region Airports Division
222 West 7th Avenue #14
Anchorage, Alaska 99513-7504

Dear Ms. Sullivan:

This is in response to the Final Environmental Impact Statement (FEIS) published on April 17, 2007, for proposed improvements to the Juneau International Airport (JNU), in Juneau, Alaska. This letter provides our comments to the aforementioned document in accordance with the Letter of Agreement between the Federal Aviation Administration (FAA) and the U.S. Army Corps of Engineers (Corps).

F-6

In order that the FAA's FEIS may be more useful to the Corps for purposes of exercising its regulatory authority, we recommend that the FAA's Record of Decision (ROD) demonstrate how the proposed work conforms with the 404(b)(1) Guidelines published for the discharge of dredged or fill material into waters of the United States (40 CFR Part 230).

F-7

Section 10 of the Rivers and Harbors Act approved March 3, 1899, (33 U.S.C. 403), prohibits the unauthorized obstruction or alteration of any navigable water of the United States. The construction of any structure in or over any navigable water of the United States, the excavating from or depositing of material in such waters, or the accomplishment of any other work affecting the course, location, condition, or capacity of such waters is unlawful unless the work has been previously authorized by the Corps. Protection of navigation in all navigable waters of the United States continues to be a primary concern of the Federal government. The District Engineer is authorized to deny permits for proposed activities when he determines that the activity will clearly interfere with navigation (33 CFR Parts 320, 322, and 325). Based upon the information provided by the FAA to the Corps and the U.S. Coast Guard during the agency meeting on May 14, 2007, the west end MALSR, associated with the FAA's Preferred Alternative 5R, for the Runway Safety Area (RSA) represents a potential interference with navigation. We recommend that the FAA's ROD evaluate the MALSR's impact to navigation in navigable waters under every RSA Alternative.

F-8

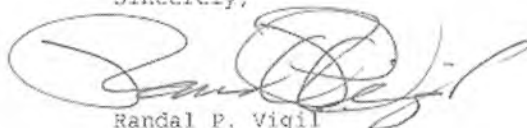
The FEIS does not evaluate the possibility of moving airport tenants to other locations on the JNU in order to accommodate expansion of the existing Snow Removal Equipment Facility (SREF) north on developed airport property between Alex Holden Drive, Cessna Drive, and Shell Simmons Drive. It may be possible to relocate lessees of airport property north of the existing SREF to an undeveloped airport tract along Berners Avenue or to the Alternative SREF-3

F-8 (cont'd)

location, which has been determined by the FAA not to be feasible for the proposed SREF, due to size limitations of the available land. The FAA's ROD should state the priority of the JNU property use. Is the SREF an essential airport function? Are tasks vital to flight operations secondary to tenant use of property? The FEIS does not clearly define what comprises the basic or necessary elements of a SREF that meet the terms of FAA regulations. Based on the information provided in the FEIS, including the conceptual plan shown in Figure 2-33, there appear to be several components to the proposed SREF that may be superfluous to the design. We recommend that the ROD assess expanding the existing SREF north under a bare bones design.

You may contact me via email at randal.p.vigil@poa02.usace.army.mil, by mail at the letterhead address, by phone at (907) 790-4490, if you have questions. For additional information about our Regulatory Program, visit our web site at www.poa.usace.army.mil/reg.

Sincerely,



Randal P. Vigil
Project Manager

Enclosures

CONCUR
CEPOA-RD
Leeds
Vigil/611/0-4490
05/24/07/(1145)
RPV/POA-1981-320-PF FEIS Comment Letter.doc

RAW
5/24/07
RS/25/07

CF:

EAST BRANCH - SOUTHEAST - Juneau Field Office

AC0ARU.R10@epamail.epa.gov
Mary.Gooden@noaa.gov
Tina_Racy@fws.gov
Claire_Batac@dnr.state.ak.us
cha_revcomp@dnr.state.ak.us
Jackie_Timothy@dnr.state.ak.us
Brady_Scott@dnr.state.ak.us
Brenda_Krauss@dec.state.ak.us
teri_camery@ci.juneau.ak.us
patricia.sullivan@faa.gov
D17-PF-DPW-ACOE@uscg.mil
David.M.Seris@uscg.mil
kwconsult33@hotmail.com
sellis@swca.com
tcarsen@carsondorn.com

5/25/07
SLI

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

Division of Sport Fish

F-007

SARAH PALIN, GOVERNOR

PO Box 110024
Douglas, AK 99811-0024
PHONE: (907) 465-4346
FAX: (907) 465-4272

June 11, 2007

Ms. Patti Sullivan, Project Manager
FAA, Airports Division-Alaska
222 W. 7th Ave., #14
Anchorage, AK 99513-3813

Dear Ms. Sullivan:

The Alaska Department of Fish and Game (ADF&G) has reviewed the Final EIS and Section 4(f) Evaluation for the Juneau International Airport Projects for compliance with provisions in the Mendenhall Wetlands State Game Refuge (MWSGR) management plan for the City and Borough of Juneau to acquire refuge land for airport expansion. Proposed projects that will affect refuge land and resources include the relocation of the mouth of Duck Creek, west end wetlands fill as part of implementing the Wildlife Hazard Management Plan, expansion of runway safety areas (RSAs), and construction of MALSR lights with a service road extending east of the runway. Modifications to the existing MALSR lights on refuge land extending west of the runway may also be necessary. The MALSR lights project is sponsored by the Federal Aviation Administration (FAA) and requires easements, but not acquisition of refuge land. The remaining projects are sponsored by Juneau International Airport (JNU) and require acquisition of about 17 acres of refuge land.

The refuge management plan lists 4 conditions that must be met before JNU can acquire refuge land for airport expansion:

1. There must be a significant public need for the expansion which cannot be reasonably met off-refuge or through use of alternative transportation modes and technologies;
2. Use of refuge lands must be avoided or minimized to the maximum extent feasible;
3. All impacts to the refuge and refuge resources must be fully mitigated through restoration and/or replacement; and;
4. The expansion project cannot create a hazardous attraction to waterfowl.

The following is my understanding of how JNU and FAA have sought to meet those conditions based on project descriptions and rationales in the FEIS.

Significant Public Need That Cannot Be Met Off-Refuge

Relocating the mouth of Duck Creek and filling wetlands at the west end of the runway will eliminate attractions to waterfowl and other large birds that pose serious hazards to aircraft. This

need to enhance public safety cannot be met off-refuge without moving the airport. In addition, the statute establishing the refuge requires the ADF&G to assist JNU in eliminating hazardous attractions to waterfowl on refuge property adjacent to the runway.

Expanding RSAs to enhance public safety has been mandated by the FAA and is a condition of JNU retaining its certification to operate in its current capacity. FAA and JNU have agreed that standard RSA construction rather than engineered material arresting system (EMAS) construction is more appropriate for JNU. The need to expand the RSAs cannot be met off-refuge.

Use Of Refuge Lands Avoided Or Minimized

The proposed acquisition of refuge lands for the West End Wetlands Fill project seeks the minimum amount of refuge land necessary to accomplish the goal of the project.

When viewed in the context of the numerous goals, regulations, and recent legislation bearing on this project, the preferred RSA alternative (5E) minimizes the amount of refuge land needed for the project. Further, the FAA recently determined that a 600-foot-long RSA will provide adequate undershoot protection for landing aircraft. To incorporate this change, JNU will allow planes landing and departing to the east and to the west to use different runway thresholds, thereby reducing the planned extension of the runway by 400 feet and eliminating the need to acquire refuge land at the east end of the runway.

Impacts To The Refuge Must Be Fully Mitigated

JNU has worked with ADF&G and other agencies to develop a fees-in-lieu plan to mitigate impacts to refuge resources and other wetlands affected by the projects. To replace MWSGR land transferred to JNU ownership, JNU will supply the Southeast Alaska Land Trust (SEAL Trust) with funding sufficient to purchase the functional capacity unit (FCU) equivalent of refuge land taken for the projects. The amount of funding dedicated to replacing refuge land will be based on an average of 126.3 FCUs per acre of refuge and a December 2005 appraisal of wetlands values around the refuge of \$30,000 per acre. To ensure the best chance of success, the portion of the mitigation plan addressing replacement of refuge land will be initially over-funded. The term "replace" means that JNU's agent, SEAL Trust, will provide fee-simple ownership of acquired lands to the State of Alaska. SEAL Trust will also receive funding to cover the administrative costs of acquiring land, and an advisory committee, on which ADF&G will have a seat, will review all parcels SEAL Trust nominates for acquisition.

The statute creating the MWSGR allows for only privately-owned land within or abutting the described refuge boundary to be eligible for acquisition and addition to the refuge. All parties to the mitigation plan understand that SEAL Trust's ability to replace refuge land will depend on the willingness of property owners to sell their land and that making newly acquired lands part of the MWSGR will require an act of the legislature. If, within a reasonable period, SEAL Trust is unable to acquire sufficient land to replace lost refuge land, funding dedicated to replacing refuge land will be eligible for use in acquisition of wetlands elsewhere.

Must Not Create A Hazardous Attraction To Waterfowl

All projects described in the FEIS were designed by JNU or FAA, and none will create a hazardous attraction to waterfowl. Further, the mitigation plan stipulates that JNU will have a seat on the advisory committee that will review parcels SEAL Trust nominates for acquisition. One role JNU will fulfill is to ensure that land acquired to replace refuge land will not create

hazardous attractions to waterfowl. However, JNU and FAA will not limit acquisition of existing wetlands near the airport to replace lost refuge land.

F-77

Based on our review of the FEIS and Section 4(f) Evaluation, we believe the projects as described meet the conditions set forth in the MWSGR Management Plan for JNU to acquire refuge land for airport expansion. ADF&G looks forward to working with JNU and FAA during the ACMP review and eventual permitting process.

Other Comments

At the May 14, 2007 agency meeting to discuss the FEIS for JNU, FAA and its consultants mentioned the need to reconfigure the existing west end MALSR lights to accommodate the planned eastward shift of the runway. FAA did not have detailed plans for how the MALSR lights would be reconfigured, but acknowledged that some MALSR fixtures would need to be moved.

F-78

The photos attached to these comments depict sections of the access route used to service the west end MALSR on the MWSGR. Wetlands have been deeply rutted, and a buried electrical cable has been exposed by erosion. Further, we can find no record of an access easement or current special areas permit allowing vehicular access. Habitat damage and operating without permits are both unacceptable situations for a State Game Refuge.

To resolve these issues, ADF&G suggests that FAA or JNU apply for appropriate easements from ADNR similar to those being sought by FAA for the planned east end MALSR lights and access road. Perhaps applications and public comment processes for both could be combined. The department also requests that FAA or JNU submit a design for building an improved at-grade road for muddier portions of the currently used east end MALSR access route. We look forward to reviewing the situation with you and working toward a mutually agreeable resolution.

Sincerely,



Tom Schumacher
ADF&G, Habitat Biologist

Enclosure

cc by e-mail:

Neil Barten ADF&G/WC
Ryan Scott, ADF&G/WC
Mark Fink, ADF&G/SF
Brady Scott, ADNR/MLW
Sherri Ellis, SWCA

F-008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 11, 2007

Reply to
Attn. of: ETPA-087

Ref: 00-043-DOT

Ms. Patricia Sullivan, Project Manager
Federal Aviation Administration
Airports Division – Alaska
222 W. 7th Avenue, #14
Anchorage, Alaska 99513-7504

Dear Ms. Sullivan:

The U.S. Environmental Protection Agency (EPA), Region 10, has reviewed the **Final Environmental Impact Statement (FEIS) and 4(f) Evaluation for the Juneau International Airport (JIA), Juneau, Alaska**. The FEIS examines the proposed actions, alternatives for each action, and identifies the preferred alternative for each action. The primary actions proposed by the FAA in the FEIS include modifications to the runway safety area (RSA), snow removal equipment and maintenance facilities, fuel farm access, aircraft parking and storage facilities, and the wildlife hazard management program.

In our letter dated July 7, 2005, we rated the Draft EIS, EO-2 (Environmental Objections-Insufficient Information). This rating was based largely on the direct impacts to high/very high functioning estuarine wetlands, wildlife habitat, and essential fish habitat, as well as impacts to Duck and Jordan Creeks, which are both Clean Water Act (CWA) §303(d) listed waterbodies, identified in the document.

Our review of the FEIS indicates that the FAA was responsive to our comments on the Draft EIS. We are pleased that new alternatives were developed, and others were modified (in particular for the RSA), using comments received from JIA, EPA, other agencies, and the public. We also acknowledge and commend the FAA for the considerable effort it undertook to carefully weigh public and agency comment following public review of the DEIS, respond with additional analysis, and revise the proposed actions in the FEIS.

EPA acknowledges the improvements that have been made and supports the identification of the preferred alternative including RSA-5E. According to the FEIS, the rationale for selecting the preferred alternative is that it meets the requirements of P.L.109-443. We would agree that FAA has satisfied the requirements of P.L.109-443 by identifying RSA-5E as the preferred alternative in the final EIS. However, compliance with P.L. 109-443 does not supersede the obligation to comply with other applicable laws such as the Clean Water Act 404(b)(1) when making a final decision about alternative implementation in the ROD. The

F-79

F-79 (cont'd)

NEPA regulations draw a clear distinction between the *preferred alternative*, which agencies shall identify in the FEIS [40 CFR § 1502.14(e)], and the *decision*, which agencies shall state in the ROD [40 CFR § 1505.2(a)]. Although agencies often decide to implement the preferred alternative, they are not required to do so. Agencies may (and sometimes do) decide to implement an alternative other than the preferred alternative. In this case, P.L. 109-443 directs FAA as to which RSA alternative to “select as the *preferred alternative*” (emphasis added), but does not specifically require implementation of the preferred alternative. The decision in the ROD should be made according to processes that comply with all relevant laws, which in this case may well lead to the same conclusion. In order to receive a 404 permit, the alternative must also meet Clean Water Act requirements. Therefore we strongly suggest that the rationale for selecting an alternative in the Record of Decision (ROD) include a discussion showing that the selected alternative complies with the 404(b)(1) Guidelines.

F-80

EPA supports the development of a compensatory mitigation plan. However, since the effectiveness of the mitigation is entirely dependent on the details and implementation of that plan, EPA encourages FAA to include specific information in the ROD, including the mitigation sequence and firm commitments for ratios and amounts.

A summary of our comments will be published in the Federal Register. Thank you for the opportunity to work collaboratively on this project throughout the development of the EIS. If you have questions or comments concerning our review, please contact Jennifer Curtis at (907) 271-6324, Chris Meade at (907) 586-7622 or me at (206) 553-1601.

Sincerely,

//s//

Christine B. Reichgott, Manager
NEPA Review Unit

Cc: Dave Palmer, Manager, JIA
Chris Meade, AOO/J
Jennifer Curtis, AOO/A

B.3 Public Comment and Response Summary

This section contains a summary table (Table B-2) of all substantive comments received on the FEIS and the FAA responses to those comments. The summary table is organized by the individual or organizational name of the commentor. All comments received from a given individual or organization are listed under the commentor name, even if a given commentor provided comments on more than one occasion or via more than one method. Unless otherwise noted, references within the Response column of Table B-2 are to sections of the FEIS.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
Juneau Audubon Society		
F-1	JAS still contends that there is little need for the runway safety areas and better alternatives to construct them could have been chosen in Congress had not muted those opportunities.	Federal Aviation Regulation, Part 139, Certification and Operations: Land Airports Serving Certain Air Carriers, requires runway safety areas (RSAs) to meet FAA standards to the extent practicable. FAA has determined that it is practicable to meet RSA standards at Juneau.
F-2	We are pleased to note that the proposed actions do not include cutting and removal of all trees in the float pond woodlands.	Thank you for your comment.
F-3	We are concerned that the action to "selectively thin trees and clear understory: is still an option that might be considered for the floatplane pond trees under the adaptive hazard management approach. We note that in Table ES-7 on page ES-46 the thinning and brush clearing option (WH-11 as described on page 2-226) is listed as the preferred alternative. We were told that this is a mistake and the preferred is actually WH-2I).	The listing of action WH-11 in Table ES-7 on page ES-71 of the stand-alone Executive Summary, Table ES-7 on page ES-46 of the Executive Summary in Part I of the FEIS, and Table 2-25 on page 2-286 of Chapter 2 in Part I of the FEIS all incorrectly list action WH-11 as part of the preferred wildlife hazard management alternative. These tables should have listed action WH-2I instead of WH-11. Selective thinning of trees and clearing of understory in the floatplane pond woodlands is not part of the preferred and selected alternative for wildlife hazard management identified in the Record of Decision. FAA has issued an errata sheet for the FEIS acknowledging and correcting this error.
F-4	We are pleased that the preferred alternatives still support the establishment of a Wildlife Hazards Working Group (WHWG).	Thank you for your comment.
F-5	Although it is laudable to try to include a diverse set of interests on the Wildlife Hazards Working Group (WHWG), the real emphasis should be on local wildlife and ecology experts.	FAA does recommend that experts in local wildlife and ecology be included as members of the WHWG, however, FAA believes that it is appropriate to include individuals representing other interests related to wildlife management in the area of the Airport.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
U.S. Army Corps of Engineers		
F-6	In order that the FEIS may be more useful to the Corps for purposes of exercising its regulatory authority, we recommend that the FAA's Record of Decision demonstrate how the proposed work conforms with the 404(b)(1) Guidelines published for the discharge of dredged or fill material into waters of the United States (40 CFR 230).	The Record of Decision will include information related to the conformance of the preferred alternatives to the 404(b)(1) Guidelines.
F-7	We recommend that the FAA's Record of Decision evaluate the impact of the Runway 08 MALSR's relocation as part of all runway safety area alternatives on navigation in navigable waters. Section 10 of the Rivers and Harbors Act (33 U.S.C. 403) prohibits unauthorized obstruction or alteration of any navigable water of the United States.	Information about the potential impact to navigation from the relocation of the Runway 08 MALSR system associated with the preferred runway safety area alternative, RSA-5E, will be included in the Record of Decision.
F-8	The FEIS does not evaluate the possibility of moving airport tenants to other locations on the JNU in order to accommodate expansion of the existing Snow Removal Equipment Facility (SREF) north on developed airport property between Alex Holden Drive, Cessna Drive, and Shell Simmons Drive. It may be possible to relocate lessess north of the existing SREF to an undeveloped airport tract along Berners Avenue or to the Alternative SREF-3 location, which has been determined by the FAA not to be feasible for the proposed SREF, due to size limitations of the available land. The FAA's Record of Decision (ROD) hould state the priority of the JNU property use. Is the SREF an essential airport function? Are tasks vital to flight operations secondary to tenant use of property? The FEIS does not clearly define what comprises the basic or necessary elements of the SREF that meet the terms of FAA regulations. Based on the FEIS, including the conceptual plan in Figure 2-33,	A thorough review of the Sponsor's proposal for construction of a SREF was performed independently by the FAA. An effort was made to assure that impacts were minimized by removing duplicate use areas, removing areas to temporarily park trailers, correct area calculation errors, and ensure that all space needs were justified. The FAA acknowledges that some wetlands and habitat would be impacted by the preferred alternative; however, this site has fewer environmental impacts than most other sites evaluated. This site is the most operationally efficient location when considered in the context of the development of all needed airport facilities, and FAA believes it represents the least environmentally damaging practicable alternative. FAA's approach to this issue is consistent with FAA Advisory Circulars 150/5200-30A, 150/5200-20, and 150/5200-18.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	there appear to be several components to the proposed SREF that may be superfluous to the design. We recommend the ROD assess expanding the existing SREF north under a bare bones design.	
B. Sachau		
F-9	Page ES-8: The estimate of 50% growth in corporate hangars is plucked out of thin air and has no relationship to reality. Spending tax dollars on this hypothetical is a money grab by the aviation industry. If this airport is so profitable, take all federal tax dollars out of this project and let private investment do it. Its tough that aircraft have to park in obscure "places" those poor rich guy plane owners need to walk a little – TOUGH, TOUGH, TOUGH. Their 2ND complaint is they are "cramped". Why are general taxpayers in America being taxed to provide land for rich aircraft owners to park their planes? The average American is not rich enough to own a plane so why does he have to pay for rich plane owners to park their planes? If commercial profiteers want large hangars for profits, get the money from the ones who use the hangars.	The DEIS and FEIS provide independent, objective projections for the increased need for corporate hangar space based upon current demand and accepted aviation forecasting techniques. The effort documented a shortage of hangar space. Please, see the footnotes to Table ES-1 on page ES-8 for the source of information used in projecting hangar demand. At least a portion of the money invested in new facilities is returned through fees imposed by airport tenants (for lease of parking spaces, hangar facilities, etc.). Additionally, funds obtained through the Airport Improvement Program, to which JNU will be applying for a grant, are derived from user fees that comprise the aviation trust fund.
F-10	Page ES-9: Means decimation of birds, mammals and I am dead set against this increase which will mean the death and destruction to let commercial profiteers make more money and also bring on global warming faster. Aviation has awful effects which exacerbate global warming. They have no conception of helping the fight against global warming or cutting their emissions which exacerbate global warming. This plan is an example.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-11	Page ES-36: The fuel pipeline is an environmental nightmare for an area known to be subject to severe earthquakes. This plan is not acceptable at all.	The fuel farm pipeline alternative was not selected as the FAA's preferred alternative. Please, see section 2.13.2.5 for a description of the preferred Fuel Farm Access alternative.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-12	Page ES-41: Nobody speaks for the lives of wildlife and birds - so they are wiped out by government agencies working for profiteers. No federal agency truly protects wildlife or birds - NONE.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-13	Page ES-43: The building plans do not seem able to withstand the changes of global warming so all tax dollars used for this project will be wasted. The Corps of Engineers - think about their work in New Orleans - does anybody truly want their services anymore???	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-14	Page ES-53: The increased wildlife control is governmentales for increased wildlife killing-- a horrendous idea.	Increased wildlife control primarily consists of increased hazing and vegetation management.
F-15	Page ES-57: God had better protect the eagles from the death squad at Juneau Airport. The Clean Air Act is assaulted by this construction and increased flights at this site yet the writer writes a lie and says no effect. To let the aviation emissions go undetected is horrendous. The Noise Abatement Act is being violated because the noise is increasing with this plan, not decreasing.	<p>Long-term air quality emissions would not increase as a result of the preferred alternatives. The preferred alternatives themselves do not provide for increased numbers of flights or changes in types of aircraft able to use the Airport. Increases in flight numbers are expected to occur regardless of whether the preferred alternatives are implemented. Short-term air quality impacts from construction of the preferred alternatives would be within established state and federal standards.</p> <p>Overall noise levels are not increasing as a result of the preferred alternatives. The existing noise level would remain the same, as the preferred alternatives do not increase numbers of flights or change the size of aircraft able to use the Airport. The locations experiencing specific noise levels would change as the runway threshold shifts to the east under the preferred RSA alternative, RSA-5E, such that some specific locations west of the Airport will experience slightly lower noise levels and other specific locations east of the Airport will experience slightly higher noise levels than present.</p>

B-19

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-16	Page ES-58: Children in schools near this airport will have trouble learning - this result has been documented by research. There will definitely be a change in risk to the health and safety of children as a result of this airport expansion. Lies, lies lies are being written in this document. People are getting lung cancer who live near airports. Teterboro Airport has done a research study on this.	Analyses were conducted for noise sensitive locations near the Airport, including schools, parks, and wildlife viewing and recreation areas. None of the noise sensitive receptors in the vicinity of the Airport would experience an increase in noise as a result of the preferred alternatives. Please, see sections 4.3.2, 4.4.2, 4.5.2, 4.6.2, 4.7.2, and 4.8.2 of the FEIS for the analysis of impacts to the human environment and compatible land use for each proposed action and its alternatives. Please, see the response to comment F-15 regarding air quality.
F-17	Page ES-59:- I would like to see a copy of the "special area permit for alteration of wildlife habitat". I am disgusted at this assault on wildlife. All of these plans mean murder of wildlife and birds. If this area is a refuge, ownership of ADNR DMLW lands are NOT a best use for this airport.	A copy of the permit is available on the Airport's website: www.juneau.org/airport/ .
F-18	Page ES-60: Parks around the airport will be decimated by this plan. There is no minimization or compensation for any impacts from this plan at all.	The commentor does not provide information about the types of impacts that parks near the Airport would experience. As such, the FAA is unable to respond to this comment.
F-19	Page ES-61: FAA finding this project is consistent with destruction of a refuge area is out of order. FAA approves all spending of general tax dollars for local profiteers with no view as to whether it makes sense or not or is a prudent use of tax dollars. FAA is on a runaway course working only for aviation profiteers and scamming the rest of the country. THIS IS NOT JUST A LOCAL MATTER AT ALL. FAA's failure to get the citizens of this nation involved in the spending of their tax dollars is a fatal flaw. I've been to FAA meetings. They are carefully scripted NOT to give the public any say at all. They allow you to write. They do not allow the citizens to openly speak ever. NOT EVER. A long time ago when the public was allowed to speak, they gave FAA an earful and now the script is that the public gets	The FAA finds that acquisition of a portion of Refuge property is consistent with the Refuge management plan and the legislation establishing the Refuge, which contains a specific provision allowing Airport use of Refuge property if necessary. The Refuge management plan establishes criteria for the management of the Refuge, including goals and objectives. The preferred alternatives incorporate measures that meet these goals and objectives. The Alaska Department of Fish and Game (ADF&G), which manages the Refuge, has conducted its own analysis of the proposed Airport actions on the Refuge. ADF&G also finds that the projects as described in the FEIS are consistent with the Refuge management plan conditions for acquisition of Refuge lands for the Airport to address aviation needs.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	no chance to speak together as a group. The meetings by FAA are carefully crafted to get the results FAA wants. It is disgusting. The FAA meetings are rehearsed to call out the profiteers and shut the public up. Those impacted with the noise, danger and pollution are shut up and shut out. So this is a lie.	
F-20	Page ES-74: I oppose any land impingement on this refuge.	The FAA acknowledges the commentor's objection to use of Refuge land for Airport and other projects.
F-21	Page 1-17: Total operations reveal no need at this time for this expansion or work or use of tax dollars.	The proposed actions and alternatives preferred by the FAA are not based on historic aviation activity or projected operations. The purpose of the proposed actions is to enhance safety and improve and increase facilities to efficiently meet current and reasonably foreseeable needs.
F-22	Page 1-20: Alaska Airlines should be constrained from buying any more 737-900's. Why the taxpayers should be conscripted to pay for all of this plan because this airline bought one plane is beyond me, as well as every other taxpayer.	FAA does not have the authority to direct the specific aircraft type or model used by private air carriers.
F-23	Page 1-37: The problem is the airport is in the wrong place. The airport is the problem, especially its desire to grow in an obviously impractical place. It wants to be the largest in the world on the American taxpayers' wallet attack. The birds should stay - they need the water and food. This airport should stay the size it is. Any growth should come at another airport site on the aviation industry wallet. Selection of this airport site was not made wisely - it just grew like topsy. No airport should destroy its surrounding area.	Construction of a new airport would most likely result in far greater environmental impacts than those resulting from the preferred alternatives in the FEIS.
F-24	Page 1-51: Any need for aviation can be met at other locations and other airports. The need does NOT have to be here.	There are no other airports in the immediate vicinity of Juneau and no other direct commercial air access to this capital city.

B-21

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-25	Page 1-54: The "assistance of wildlife services" in dealing with wildlife hazards sounds so nice and peaceful - yet the assistance is shooting, poisoning and destruction of ALL birds or wildlife by aphis. It is a disgustingly obscene scenario and the deception of this writing is purposeful and it is lying.	Please, see section 2.13.2.6 for information about the specific activities comprising the preferred alternative for wildlife hazard management.
F-26	Page 1-67: Shows numerous reasons why this expansion plan should not happen.	Please, see section 1.4, Purpose and Need, for a description of the need for and the purpose of the proposed actions.
F-27	Page 1-68: A seafood processing plant is 5 miles away and draws birds. This site is no place for this airport to grow or for the seafood processing plant to be sited.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-28	Page 1-89: Hunting makes birds fly away and is one reason for bird strikes. In addition, no airport should want gun wacko psychopaths shooting near planes.	Please, see section 2.13.2.6, page 2-295 of the FEIS in which the FAA recommends that hunting on Airport property be discontinued.
F-29	Page 1-72: Tree cutting by Jordan Creek shows airports insensitivity to its neighbors. It shows airports crass overpowering and lack of consideration for its neighbors or for the environment. It shows anti-environmental attitude. This need for actions is based on profiteers desire for bigger profits, bigger everything. This is not at all based on existing uses.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-30	Page 1-73: There is not enough space to support jet carrier operations at this airport. Therefore, this site is unacceptable and no expansion should take place. The airport is heavy handed re: whether analysis of bird strikes should be made. Such an analysis should be made. Airport is far too heavy handed.	Please, see the response to Comment No. 21. An analysis of bird strikes was made for the Wildlife Hazard Management Plan, which is a proposed action in the FEIS. Please, see section 1.4.4.1 regarding bird strike data for the Airport.
F-31	Page 1-74: I agree with the comment that bird and mammal surveys need to be taken. I do not trust the Army Corps of Engineers after seeing New Orleans being flooded by their lack of sound construction.	Surveys of bird and mammal populations within the Airport study area were conducted as part of the EIS. Please, see section 3.10 of the FEIS for information on wildlife identified in the study area.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-32	Page 1-75: Light pollution - airport stifles complaints from residents on light pollution. They say nothing is reported. Far too often airports purposefully LOSE complaints. Airports prefer not to keep records of complaints.	No comments regarding light pollution were received by the FAA from the public during the review of the Draft EIS or during public scoping.
F-33	Page 2-97: Lethal control - KILLING birds and mammals is what airports do. As this report shows airport tries to keep this a secret from the public, who are outraged over wildlife murder.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-34	Page 2-98: Wildlife Service aphis always specializes in wildlife killing - wildlife murder. I cannot believe hunting on an airfield is safe when I read the endless report I get every day on one hunter shooting somebody every single day. I believe this is extremely negligent to have any hunting near an airport.	Please, see the response to Comment No. F-28.
F-35	Page 2-213: Installing pipelines in a volcanic area is a very huge potential hazard. The example of oil pipelines in Alaska not being maintained for 17 years is also indicative of this being a very, very unsound idea.	Please, see the response to Comment No. F-11.
F-36	Page 2-226: I oppose all of the trees being cut. The erosion when you lose a tree, the temperature increase when you lose a tree, the envirotranspiration rate changes - you want to save all trees.	Please, see section 2.13.2.6 in which the preferred alternative for wildlife hazard management is described. Cutting or selectively thinning of the Float Plane Pond woodlands is not part of the preferred alternative.
F-37	Page 2-232: I oppose a full time wildlife hazard control officer. I am sick of all the killing of God's creature by airports. What is hazardous is this airport - that is the biggest hazard of all - the airport.	The FAA acknowledges the commentor's objection to the appointment of a full time wildlife hazard control officer at the Airport.
F-38	Page 3-5: The way FAA measured noise is perverted and strange. A noise can be 85 decibel but FAA requires averaging that over 24 hours - how absolutely stupid to tell how loud	The method used to assess noise for the FEIS meets acceptable government standards and practice.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	something is and how disturbing it is by whether it is averaged over 24 hours.	
F-39	Page 3-6: The loss of sleep is extremely serious and lead to ill health, serious physical health problems, lack of attention and possible death. It cannot be minimized by the dismissal on this page when it is a serious health issue. Lung cancer, heart attacks, strokes, pneumonia, allergies, asthma - all are a result of aviation increase.	This comment contains statements of opinion and factual assertions that the FAA is unable to verify. As a result, the FAA is not able to provide a meaningful response.
F-40	Page 3-110: The fact that Juneau Airport has spent NOTHING to collect de-icing toxic chemicals is obnoxious and obscene. The airport owners should be in jail for this failure to take these steps.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-41	Page 3-112: The polluting nature of this airport is evident and it is scandalous. This airport has spent nothing on maintenance. They use the river as their sewer. They let deicing chemicals pollute the area. Why are no TMDL's set for the Mendenhall River?	<p>JNU is in the process of updating their Stormwater Pollution and Prevention Plan (SWPPP) to account for changes in runoff that will occur as a result of the selected alternatives. Please, see section 2.11.7 of the FEIS for information about stormwater management at the Airport.</p> <p>The Alaska Department of Environmental Conservation establishes TMDLs for waterways in Alaska. The Mendenhall River is not an Alaska 303(d) impaired water body, which is the criterion for establishing TMDLs.</p>
F-42	This plan should be denied.	The FAA acknowledges the commentor's objection to the approval of actions identified in the FEIS.
F-43	Page 4-4: The date of 2000 was used for noise statistics yet the reason for this upgrading is to allow more and bigger planes, which will bring noise well above 2000 impacts. Such an impact is negative for this area - extremely negative and the way it is measured seems strange and deceptive as well.	The proposed actions are not designed to accommodate more or larger aircraft. Rather, they are intended to improve the operational safety and efficiency of existing Airport uses and bring the Airport into compliance with FAA's national safety standards.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-44	Page 4-5: The future dates this plan is (sic) for waffle from 2015 to 2020 - depending on how the writer wants to influence the reader. This is biased, deceptive, writing since it compares apples to oranges. I think the results of "noise analysis" are doctored and biased. When profiteers seek to make money for themselves and harm others thereby, they always paint that rosy picture (which never turns out to be true).	The future date used for noise analysis throughout Chapter 4 and in Appendix C of the FEIS is 2015.
F-45	Page 4-12: No fine particulate matter studies were done, based on a specious reason, beneficial only to the profiteers. Was the "average" day in July or December? We are not told. Fine particulate matter of course has been measured from aviation activities and it is horrendously injurious to the public's health. I do not think personal communications of Ralph Iovanelli should be used as a reference since the public has no access to this kind of document. Fine particulate matter is not smoke. Fine particulate matter travels thousands of miles and causes lung cancer, heart attacks, strokes, pneumonia, allergies and asthma and death and injury and big hospital bills and hospice bills.	The "average" day represents an average across all days of the year. Using PM10 emissions as an indicator of PM2.5 emissions is a practice accepted by the EPA and results in conservative estimates of PM2.5 emissions. The communication from Mr. Iovanelli was in reference specifically to the JNU EIS and included his concurrence for using this method to estimate PM2.5 emissions for the proposed Airport actions.
F-46	Page 4-16: 500-year floods are happening every 8 years here in New Jersey and I suspect worldwide now. I wonder why it is still caused (sic) 500-year floods when global warming has emphasized all weather patterns and that is what has to be planned for. Are these areas truly prepared for these extensive floods every 8 years?	This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.
F-47	Page 4-20: I always oppose all invasions of wetlands which are crucial to all life on earth. This is such a plan.	The FAA acknowledges the commentor's objection to impacts on wetlands from the proposed actions.
F-48	Page 4-36: In view of carbon emissions from airplane travel, I do not believe visits to Alaska will rise as much as these projections	The air travel forecasts are based on nationally accepted forecasting methods. The effects of climate change on air travel are not well

B-25

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>show. The effects of climate rampage may impact travel more than these projections take account of. They may make the whole project not necessary at all. To claim more flights are coming in and noise won't go up is also an oxymoron and a lie. Here in New Jersey we live with increasing number of flights and believe me, the noise goes up!!!</p>	<p>understood at this time, and to use such information in projecting travel demand would be speculative.</p> <p>The commentator has confused air travel forecasts with the noise analysis for projects specifically considered in the FEIS. Actions assessed in the FEIS do not in themselves increase the number of flights at the Airport; the number of aircraft using the Airport is expected to increase, regardless of whether or not any of the proposed actions are implemented.</p>
F-49	<p>Page 4-65: The noise impact and the closeness of the refuge is a very severe assault on this refuge. This plan should be denied because of its assault on the refuge.</p>	<p>This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response. However, the FAA acknowledges the commentator's objection to any noise impact on the Refuge.</p>
F-50	<p>Page 4-138: There are ONLY negative effects on wildlife from this plan. It is all negative for them.</p>	<p>This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.</p>
F-51	<p>Page 4-280: 75% increase in impervious coverage is an invitation to disaster. The loss of 331 acres of floodplain, tidal storage volume is also an invitation to disaster. The impact to estuarine areas is far too severe - these are all excellent reasons to deny this plan.</p>	<p>This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.</p>
F-52	<p>Page 5-34: The impacts to fish stocks and marine life and birds that rely on that fish are major and severe and an excellent reason to deny this building. The taxpayers certainly don't want to pay the billions that will be required for this since that is how this building is being planned - on the backs of national taxpayers. Aviation should be looked to finance this from their profits, not general taxpayers many of which never travel by air.</p>	<p>This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-53	Page b-28 and preceding and following: Trap and "remove" - Murdered? Killed? Removed to where? There is more deception going on here in the writing of this report. If the animal is killed, then it should be so stated, not deceptive words like this used that attempt to fool the public. Airports routinely use only shooting and killing all life on their sites. There is endless deceptive writing in this document. I also don't believe the answers you got from other airports were complete or honest.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-54	Page M-16 - comment 11: There is no need for this plan. The runway is already long enough. Sounds right to me.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-55	Page m-20: The advocacy of the FAA is wrong. I agree with comment 204 there is a conflict of interest by FAA in this plan. I also agree with resolution (sic) 2005-01. This plan is unacceptable.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-56	I agree with the following: Page m-22, comment 212 Page m-23, comment 213 Page m-24, comments 214 and 215 Page m-28, comment 235 Page m-32, comment 246 Page m-90, comment 37 Page m-103, comment 397 Page m-105, comment 402 Page m-106, comments 405 and 406	Please, see the responses to the comments you've cited.
F-57	I do not agree with the following: Page m-37 comments 266 and 267 Page m-52, comment 320	Please, see the responses to the comments you've cited.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	Page m-8 (sic), comment 151	
F-58	Page m-43: Comment 286 is sound construction advice.	Please, see the response to Comment 286.
F-59	Page m-62: Comment 49, the deer fence needs to be 12 ft high	This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.
F-60	Page m-93, comment 170: We have put humans ahead of the birds for the last 500 years. There are few birds left, a clear sign of ecological disaster. To be so uninformed and to comment is atrocious.	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-61	Page m-94, comment 59: The burden on general taxpayers of paying ten million dollars every ten years for this airport is unreasonable and wasteful. Use of materials that do not stand up is wasteful. I think we need to tax aviation which is causing this out of control spending to pay these costs	This comment consists of a statement of opinion for which the FAA is unable to provide a meaningful response.
F-62	Page x-6: 1992 report of fic (sic) on noise is very obsolete - this kind of use of old material severely causes misplanning.	This comment consists of a statement of opinion and factual assertions that the FAA is unable to verify. As such, the FAA is not able to provide a meaningful response.
Territorial Sportsmen		
F-63	Section 4(f) analysis of preferred alternatives for the Runway Safety Area, Navigation Lighting System, and Wildlife Hazard Management Plan are deficient in that they do not address compensatory mitigation for direct takes of MWSGR lands. In fact, the analysis does not even reference the Mitigation Plan contained in Section 2.12.3 of the FEIS, which partially addresses the issue.	Please, see sections 4.3.13, 4.4.13, and 4.8.13 of the FEIS for the detailed analysis of potential impacts to Section 4(f) resources. The mitigation plan discussed in section 2.12.3 of the FEIS is intended to be comprehensive and address the overall combined impacts of the preferred alternatives rather than focusing on each specific impact. As noted in several places in the FEIS, including section 2.11, measures to minimize impacts to the Refuge were incorporated into preferred alternatives. For example, active relocation of East Runway Slough will reduce the overall impact to the Refuge from the preferred runway

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
		<p>safety area alternative by maintaining hydrologic connectivity between the areas north and south of the runway. Where avoidance or minimization are not possible, the overall compensatory mitigation plan accounts for the combined impacts to resources such as wetlands from all actions, including the runway safety area, the navigational aids, and the wildlife hazard management plan. The sections of the FEIS discussing Section 4(f) must be taken in the context of the entire FEIS and are not intended to be stand-alone sections.</p> <p>The ADF&G, which oversees management of the Refuge, has stated that the elements of the Compensatory Mitigation Plan, as developed in consultation with the ADF&G and other regulatory agencies, "meet[s] conditions set forth in the MWSGR Management Plan", including the requirement that all impacts to Refuge functions and values be fully mitigated (Letter from T. Schumacher, ADF&G, to P. Sullivan, FAA, June 11, 2007).</p>
F-64	<p>Compensatory mitigation proposed in the JNU 2006 Compensatory Mitigation Plan, as presented in Section 2.12.3, would not compensate for the take of land from the MWSGR because it does not contain a mechanism whereby the land acquired by SEAL Trust would be transferred to the refuge once acquired. This is vitally important to us because lands within the MWSGR can be used for waterfowl hunting, while those lands not within the boundaries of the MWSGR cannot legally be used for hunting. Furthermore, if the acquired land is not incorporated into the refuge, it legally does nothing to compensate for taking of land from the refuge.</p>	<p>The final mitigation plan is being developed in conjunction with project permitting. The specific disposition and management jurisdiction over any lands acquired for mitigation purposes will be addressed in the final mitigation plan.</p> <p>The mitigation plan calls for a tiered approach to acquisition of lands by SEAL Trust. This approach identifies the acquisition of accreted lands to be added to the Refuge as the highest priority. Additional funding would be used to acquire lands or carry out mitigation projects recommended by the SEAL Trust advisory committee.</p>
F-65	<p>The FEIS seems to be intentionally vague on the issue of taking of lands from the MWSGR. For instance, the Table 2-26, "Summary of Combined Impacts of all Actions Comprising FAA's</p>	<p>The Record of Decision summarizes the combined use of Refuge lands for all preferred actions. Information about the impacts on Refuge lands was provided for each action and its alternatives in the summary</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>Preferred Alternatives”, does not quantify the take of land from the refuge. In addition, the section in chapter 4 describing the impacts to the refuge resulting from construction of the MALSR lighting system is vague as to whether this action would result in a take, or an easement. Surely after all this analysis and time, someone knows this.</p>	<p>of impact tables in Chapter 2 of the FEIS. Please, see Tables 2-13, 2-14, 2-16, 2-20, 2-21, and 2-23.</p> <p>Use of Refuge land for the Runway 26 MALSR system could be accomplished through either direct acquisition of land from the Refuge or through an easement. The Alaska Department of Fish and Game (ADF&G) and Department of Natural Resources, Division of Mining, Land and Water (ADNR-DMLW) have indicated that an easement may be the most appropriate instrument for accommodating the installation of the Runway 26 MALSR on Refuge lands. The ADF&G and ADNR-DMLW will review the permit application submitted by the Airport for the selected MALSR alternative (NAV-2B). They will conduct an independent evaluation of the consistency of the project and its minimization and mitigation measures with the Refuge Management Plan and will hold a public hearing to disclose their findings and solicit public input prior to issuing a formal finding as to whether use of Refuge lands for Airport purposes is in the best public interest. Please, also see section 2.13.2.7, pages 2-300 and 2-301, which provide information on the statutes governing leasing, permitting, and conveyance of state-owned lands.</p>
Juneau Watershed Partnership		
F-66	<p>The Juneau Watershed Partnership prefers alternatives in the EIS that support the least amount of impact to fisheries habitat and water quality in the Mendenhall Watershed, while maintaining the development of a safe and viable Airport for the Juneau community.</p>	<p>The FAA acknowledges the Juneau Watershed Partnership's preference for alternatives that result in the least amount of impact to fisheries habitat and water quality within the Mendenhall Watershed.</p>
F-67	<p>Section ES.2.3.3 FUEL FARM ACCESS</p> <p>The Partnership would like to recommend that in the future, your fuel farm should be moved away from the banks of Duck Creek and the adjacent residential area.</p>	<p>Relocation of the fuel farm is not an action under consideration in the EIS.</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
F-68	<p>Section ES.4.1.3 JORDAN CREEK CULVERT and Section ES.4.1.4.1 BOTTOMLESS ARCH CONCRETE CULVERTS FOR EAST RUNWAY SLOUGH</p> <p>In regards to new culvert construction within the project scope, the Partnership recommends the use of bottomless arch culverts whenever feasible. Bottomless arch culverts are the best choice for maintaining fish passage, fisheries habitat and stream flow. We also recommend that bottomless arch culverts be used when replacing culverts at the airport in the future.</p>	<p>The FAA has included the use of bottomless arch or equivalent box culverts wherever practicable to facilitate fish passage and maintain fish habitat. For example, see sections 2.11.3 and 2.11.4.1 of the FEIS, which identify bottomless arch culverts as appropriate structures for use on Jordan Creek and the relocated East Runway Slough crossing. Since publication of the FEIS, the FAA has determined, in consultation with the Airport and the regulatory agencies, including NMFS, that squash culverts designed to maintain the same flows and streambed conditions as bottomless arch culverts would also be appropriate structures for use as part of the selected alternatives.</p>
F-69	<p>Section ES.4.1.5- MALSR ACCESS ROAD</p> <p>Although an at-grade road to access the MALSR is in the preferred Alternatives RSA-5E and NAV-2B, we continue to recommend that the Airport use an all-terrain vehicle (ATV) road instead of constructing a permanent access road. The use of an ATV would be more cost-effective, reduce maintenance costs, provide quicker access in inclement weather, and reduce wetland loss, drainage changes and other environmental impacts.</p>	<p>ATVs would not provide the payload capacity needed for maintenance of the light system. The at-grade road would be designed to minimize impacts to wetlands, hydrology and habitat. The road would be constructed of a geotextile material that allows for vegetation growth through the road bed, which provides for re-establishment of vegetation disturbed during construction.</p>
F-70	<p>Section ES.4.1.7.1 STORMWATER POLLUTION PREVENTION PLAN</p> <p>In regards to your deicing operations, the Partnership would like to recommend that you preserve existing stormwater run off areas to provide natural filtration for your deicing solution.</p>	<p>Please, see section 2.11.7 of the FEIS for information about stormwater management at the Airport. This section outlines the measures to which the Airport has committed as part of their current and future updates to their Stormwater Pollution and Prevention Plan (SWPPP).</p> <p>FAA has advised the Airport that a revised Stormwater Management Plan should be developed prior to the initiation of construction for selected alternatives and as part of the permitting requirements.</p>
F-71	<p>Section 2.13.2.1 RUNWAY SAFTEY AREA</p>	<p>FAA has committed to a 1:1 or steeper side slope to reduce the fill footprint south of the Runway. Gabion walls were identified as one type</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>It is clear that Alternative RSA-5E is preferred: however, it is unclear whether details for this alternative include mandatory use of Gabions. However, discussion in section 2.11.2 and Figure 2-50 seem to imply Gabions will be included as part of the preferred alternative. The Partnership feels this is a poor short term solution that will lead to problems in the future because Gabion walls are prone to failure, which results in impacts to wetlands in the immediate vicinity and structural integrity problems for the supported feature—in this case, the RSA.</p> <p>A better solution is to provide a steep (1.5 to 1) slope of effective filtration to protect the greater wetlands which are adjacent to the project area.</p>	<p>of measure that could be used to further reduce the footprint of the RSA. FAA agrees that it is not desirable to construct an unstable fill slope. Additional alternatives to maintain the steeper stable fill slope will be evaluated during design. Please note, some form of slope stabilization will be necessary in the vicinity of the relocated East Runway Slough in order to ensure the new channel does not erode the toe slopes of the RSA. However, at least some portion of the RSA end slope cannot include a gabion wall, as access to the MALSR maintenance road from the end of the RSA is necessary.</p>
F-72	<p>The Juneau Watershed Partnership has long been concerned about the health of Duck Creek, as our Partnership evolved from the long standing ‘Duck Creek Advisory Group’. The Partnership has been monitoring Duck Creek since 2003, but as of 2007 we have stopped the monitoring activities in part because we feel that at this point there are other waterways in Juneau that have more opportunities for stream and fish habitat improvements.</p>	<p>The conceptual design for relocation of the lower reach of Duck Creek is consistent with the management objectives outlined in the Duck Creek Restoration Plan.</p>
F-73	<p>The Partnership believes that the 5-year monitoring project for Duck Creek is not a valuable mitigation project for Juneau, and the monies currently allocated to this project should be reassigned to more meaningful and fiscally responsible projects, such as the following:</p> <ol style="list-style-type: none"> 1. A Jordan Creek Non-point Source Contaminant Assessment <p>This project would include assessing and mapping potential contaminants and nonpoint sources of pollution in the watershed.</p> <ol style="list-style-type: none"> 2. A Jordan Creek Active Contaminated Sites and Groundwater 	<p>The Airport has worked with an interagency group comprised of the FAA, CBJ, ADNR, USACE, NMFS, USFWS, EPA, ADF&G, and SEAL Trust and others to develop a mitigation plan that would compensate for the unavoidable adverse impacts to wetlands and fisheries associated with the selected alternatives. Section 2.12.3 of the FEIS includes a summary description of the draft Compensatory Mitigation Plan. Since publication of the FEIS, the draft plan has been updated to reflect the greater level of project design contained in the Airport's permit application.</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>Flow Assessment.</p> <p>This project would assess active contaminated sites and groundwater flow into Jordan Creek and associated wetlands.</p> <p>We highly suggest that the City and Borough of Juneau, the Juneau International Airport and other permitting agencies reconsider the current mitigation plan.</p>	
F-74	<p>The Purpose and Need Statement is legally insufficient under NEPA on account of vagueness and broadness. One could, as they say, drive a truck through how broad it is – or in this case, an airplane.</p>	<p>This comment consists of a statement of opinion that the FAA is not able to provide a meaningful response.</p>
F-75	<p>The FEIS is actually a Draft EIS masquerading as an FEIS. It includes three new RSA alternatives and scintillating new information (including pictures!) on spruce root gathering on airport lands and adjacent lands. These changes and this information gathered should have been the subject of a new Draft EIS, with consideration and analysis responsive to this information.</p>	<p>Alternatives RSA-5D, RSA-5E, and RSA-6D are not substantively new alternatives but rather are modifications of alternatives contained in the Draft EIS. These three alternatives were developed in response to comments on the Draft EIS and to changes in FAA policy regarding RSA standards. The FAA accepted comments on the Final EIS so that the public and agencies would have an opportunity to review and comment upon these three modifications to RSA alternatives amongst other changes between the draft and final EIS. The FAA has considered comments from the public and agencies on the FEIS in preparing the Record of Decision.</p> <p>The pictures and oral interview information regarding spruce root gathering were included in the Draft EIS. Please, see Appendix G of that document.</p>
F-76	<p>The EIS fails to do any analysis of comments acquired on the Draft EIS, such as the information regarding spruce root gathering. For example, while Mr. Mobley did an admirable job of contacting people who use the land included in the scope of the expanded runway and airport areas considered under various</p>	<p>No comments were received on the Draft EIS regarding spruce root gathering. All information about this activity was obtained prior to the publication of the Draft EIS and included in that document, including Appendix G, which provides the documentation of oral interviews about</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>alternatives, and land adjacent thereto, there is absolutely no analysis of this data. Mary Lou King and Janice Criswell provided ample testimony for such analysis, and none is conducted in this “FEIS.” Sealaska Heritage Institute also weighed in on this topic. Inexplicably, there is one excruciatingly tangential statement buried in the EIS, that “Access to the spruce grove for the purpose of gathering spruce roots is by special permit only... [and] according to Airport staff, as security increases, the number of permits issued for this purpose may decrease.”</p> <p>As a spruce root gatherer, I find this gathering of valuable information and failure to do anything but include this testimony regarding this land use in the EIS to be not only legally insufficient, but downright offensive. The writers of this EIS on this proposed action have a duty to consider and analyze and impacts of the proposed action on spruce root gatherers, and indeed on the ancient Northwest Coast weaving tradition using spruce roots whose aging elders use and need to use available trees of a certain age in flat sandy soil such as the airport spruce groves provide. The EIS writers have a duty to consider what the proposed action is going to be, on this use and these users, and not the other way around.</p> <p>The law requires it, and the root gatherers deserve, not only to be listened to, but provided for – within the documentation of this EIS, and not simply with a dismissive sentence that “airport staff” (who incidentally were not even named in the EIS) consider them a security risk and will decline permitting their use of the spruce groves in the future. As the testimony provided by King and Criswell shows, spruce root gathering has a long tradition at the airport and the needs of the weaving community and newcomers to this tradition depend upon inclusion in the process. It is a</p>	<p>the subject and pictures of spruce root gathering and woven items.</p> <p>In part because of the concern over potential impacts to spruce root gathering and in part because of concern over wildlife viewing opportunities and loss of wildlife habitat, the proposed action that would have resulted in impacts to the spruce grove—cutting or thinning of trees in the grove—were not included in the preferred alternative for the wildlife hazard management plan. The FAA does not intend to select the action to remove the trees and for the reasonably foreseeable future the Float Plane Pond woodlands should remain in approximately their current condition.</p> <p>Actions by the Airport to reduce the number of special permits granted for spruce root gathering are not under the jurisdiction of the FAA and are not among those actions considered in the EIS. No action to restrict access to the spruce grove for the purpose of gathering roots was specifically proposed by the Airport. Information about possible future limitations on permits for gathering was included in the EIS to acknowledge that other actions, outside of those considered in the EIS, could occur that may impact this activity.</p> <p>Acknowledgement of potential impacts to spruce root gathering is contained throughout Chapter 4 of the EIS. For example, please, see Section 4.8.11 and its subsections regarding the potential impacts from implementation of alternatives for the Wildlife Hazard Management Plan on spruce root gathering.</p>

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	foreseeable and extremely compatible use that should be provided for in all of the analysis of the various alternatives in this EIS process.	
F-77	ADF&G believes that the preferred alternatives as described in the FEIS meet the conditions set forth in the Mendenhall Wetlands State Game Refuge Management Plan for JNU to acquire Refuge land for airport expansion.	The FAA acknowledges that the ADF&G believes the preferred alternatives meet the conditions in the Refuge Management Plan for acquisition of Refuge lands for Airport purposes.
F-78	Implementation of the preferred RSA alternative, RSA-5E, would require relocation of the MALSR system for Runway 08. Maintenance activities for the existing MALSR system for Runway 08 have resulted in deep rutting of wetlands, and the system cables have been exposed by erosion. Further, we can find no record of an access easement or current special areas permit allowing vehicular access. Habitat damage and operating without permits are both unacceptable situations for a State Game Refuge. To resolve these issues, ADF&G suggests that FAA or JNU apply for appropriate easements from ANDR.	FAA is committed to working with ADF&G to address rutting and other problems associated with the existing Runway 08 access route. Additionally, FAA will work with ADF&G to obtain required access easements and special area permits necessary for vehicular access for operation and maintenance of the existing approach light system.
U.S. Environmental Protection Agency		
F-79	EPA supports the identification of the preferred alternative including RSA-5E. According to the FEIS, the rationale for selecting the preferred alternative is that it meets the requirements of P.L.109-443. We would agree that FAA has satisfied the requirements of P.L.109-443 by identifying RSA-5E as the preferred alternative in the final EIS. However, compliance with P.L. 109-443 does not supersede the obligation to comply with other applicable laws such as the Clean Water Act 404(b)(1) when making a final decision about alternative implementation in the Record of Decision (ROD). The NEPA regulations draw a clear distinction between the preferred	A discussion about the rationale for selecting Alternative RSA-5E, including its compliance with the 404(b)(1) guidelines will be included in the Record of Decision.

Table B-2. Summary of FEIS comments and FAA responses

#	<i>Comment Summary/Excerpt</i>	<i>Response</i>
	<p>alternative, which agencies shall identify in the FEIS [40 CFR § 1502.14(e)], and the decision, which agencies shall state in the ROD [40 CFR § 1505.2(a)]. Although agencies often decide to implement the preferred alternative, they are not required to do so. Agencies may (and sometimes do) decide to implement an alternative other than the preferred alternative. In this case, P.L. 109-443 directs FAA as to which RSA alternative to “select as the preferred alternative” (emphasis added), but does not specifically require implementation of the preferred alternative. The decision in the ROD should be made according to processes that comply with all relevant laws, which in this case may well lead to the same conclusion. In order to receive a 404 permit, the alternative must also meet Clean Water Act requirements. Therefore we strongly suggest that the rationale for selecting an alternative in the ROD include a discussion showing that the selected alternative complies with the 404(b)(1) Guidelines.</p>	
F-80	<p>EPA supports the development of a compensatory mitigation plan. However, since the effectiveness of the mitigation is entirely dependent on the details and implementation of that plan, EPA encourages FAA to include specific information in the ROD, including the mitigation sequence and firm commitments for ratios and amounts.</p>	<p>Specific information from and about the final mitigation plan developed through the permitting process will be contained in the Record of Decision.</p>