

Panama City-Bay County International Airport
Appendix B Comment & Response Summary

PUBLIC ORGANIZATION INDEX

Agency	Commentor	Type of Comment	Code #
Natural Resources Defense Council (and other environmental organizations)	Melanie Shepherdson (and other signatories)	Individual Letter	P001
Bay Aircraft Owners, Inc.	Wm. Gregory Bruce, M.D.	Individual Letter	P002
Natural Resources Defense Council	Melanie Shepherdson	Individual Letter	P003

Melanie Shepherdson (and other signatories)
Natural Resources Defense Council (and other organizations)
P001 Public Organization

Comment 1 Our review of the Final Environmental Impact Statement (“FEIS”) issued by the Federal Aviation Administration reveals that the FEIS does not cover the appropriate scope of environmental impacts that will result from the proposal to relocate the Panama City Airport to the West Bay site. The proposal to build a new airport at the West Bay site involved both redeveloping the existing airport site and spurring further development surrounding the new airport. However, the effects of these actions have not been fully evaluated.

Response The FAA has fully evaluated direct, indirect, and cumulative impacts related to the relocation of the Panama City-Bay County International Airport (PFN) which constitutes the “hard look” required by NEPA. Although the comment suggests that future development in the area surrounding the relocated airport is part of the proposed action, this is not the case. Future development in the area surrounding the relocated airport is a local matter over which the FAA has no review or approval authority. The FAA correctly disclosed the cumulative impacts of relocation to the West Bay Site, which includes the environmental impacts of potential development surrounding the West Bay Site. (See Section 5.26 of the FEIS). The FAA did not address environmental impacts in the area surrounding the relocated airport because such actions would be under the purview of state and local regulatory agencies. Much like future development in the area surrounding the relocated airport, redevelopment of the existing airport site is not, as the commentor suggests, part of the proposed project. However, there is a relationship between the proposal to relocate PFN and the future federal decisions regarding transfer of the Airport Sponsor’s federal grant obligations to the relocated airport, decommissioning of the Existing Site facilities and release for disposal of the Existing Site for non-aeronautical use (referred to herein as “decommissioning and release”). In other words, future decisions regarding decommissioning and release would not be necessary absent FAA approval to relocate PFN to the West Bay Site. As a result, the FAA disclosed the potential impacts of redevelopment of the existing site, which would be an indirect impact of decommissioning and release, based on the best available information at the time of the Draft EIS. (See Sections 2.2.2 and Chapter 5 of the DEIS). This information was refined and expanded in the Final EIS, after the release of the *Redevelopment Report* and the greater detail that became available in that report.

Comment 2 To meet the agencies’ obligations under the National Environmental Policy Act (“NEPA”) to take a “hard look” and fully evaluated the environmental effects of building a new airport at a Greenfield site in West Bay, the FAA and Corps should perform a Programmatic Environmental Impact Statement (“PEIS”) to evaluate the cumulative environmental impacts of building a new airport in a Greenfield and developing the old airport site.

Response The EIS prepared for the relocation of the Panama City-Bay County International Airport will serve as a programmatic EIS for purposes of tiering for further actions subject to NEPA review (*i.e.*, decommissioning and release), subsequent development on the relocated airport site) consistent with CEQ regulation 40 CFR Section 1502.20 and 1508.28. However, the request for a newly prepared programmatic EIS is not appropriate for the reasons explained above in the FAA’s response to Comment 1, namely, that redevelopment of the existing site is not a federal action or approval subject to NEPA. It is a local decision over which FAA has no purview or authority. The FAA’s federal action of decommissioning and release has been evaluated in the FEIS to the maximum extent possible using the best information currently available, and this evaluation included indirect impacts associated with potential redevelopment of the existing site. This is fully in keeping with NEPA. Future action to decommission and release the existing airport will be

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accompanied by further NEPA evaluation when these decisions are ripe. Such NEPA evaluation will incorporate any additional information available based on local decision making processes and land use decisions. See response to Comment 4 below for further information regarding the redevelopment of the existing site, its current status, and the evaluation of redevelopment contained in the FEIS.

Comment 3 However, in the event that the agencies disagree with us about their obligation to perform the broader PEIS, the circumstances here demonstrate that at a minimum the FAA must prepare a Supplemental Environmental Impact Statement (“SEIS”) to fully evaluate the environmental impacts of redevelopment of the existing airport site

Response The FAA does not believe that the refined information regarding redevelopment of the Existing Site contained in the FEIS would meet the CEQ standard for the development of a Supplemental EIS or affect the FAA’s analysis of alternatives considered in the EIS. In addition, the FAA offered the opportunity for public comment on this information with publication of the Final EIS and the information was available to the federal decisionmaker. See responses to Comments 1 and 4 of this letter for further information regarding the relationship between relocation of the airport to the West Bay Site and future action to decommission and release the existing site.

Comment 4 The development around the West Bay site and the redevelopment of the existing airport site are geographically related and connected to the proposal to build a new airport at the West Bay site.

Neither redeveloping the existing airport, nor developing the land around a new airport at the West Bay site has independent utility. Rather, both redevelopment of the existing airport and development of the 70,000 acres surrounding the proposed West Bay airport site are connected to building a new airport at the West Bay site. Obviously, the existing airport will only be redeveloped if a new airport is built at a different site. EPA’s comments on the draft EIS explicitly recognize that “[t]he fate of the existing site is a *connected action* that is important to the overall project.” FEIS Vol. III, EPA comments on DEIS at 4 (emphasis added).

Response The substance of this comment suggests that the proposed action (relocation of the airport) and redevelopment of the existing airport site and secondary development surrounding the relocated airport are connected actions within the meaning of 40 C.F.R. §1508.25(a)(1).

Regarding the first claim, redevelopment of the existing airport site after PFN has been relocated is not a federal action or approval. Assuming that FAA’s future decisions regarding transfer of the Airport Sponsor’s grant obligations and decommissioning of aviation facilities at the existing airport site are actions connected to the proposed relocation of PFN, impacts associated with decommissioning and release were evaluated in the Draft and Final EIS. There are no direct environmental impacts associated with decommissioning and release. Nonetheless, the FAA recognizes that future FAA action regarding decommissioning and release may have indirect impacts, particularly related to redevelopment of the existing airport site. To address these potential indirect impacts, the FAA evaluated the impacts associated with potential redevelopment of the existing site based on the best information available at the time of both the Draft and Final EIS. Such impacts are disclosed in the Draft EIS at Sections 2.2.2 and Chapter 5. As disclosed in the FEIS at Section 5.1, further revision to these impacts was disclosed using a composite redevelopment scenario based on the RFP and accompanying

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Redevelopment Report issued by the Airport Sponsor on October 2005. At this time, there is no approved plan for redevelopment. As explained in the EIS, the three scenarios presented in the RFP and Redevelopment Report represent only three proposals of a potentially limitless number of redevelopment options, any of which might be approved. Even when a final redevelopment option is selected, that decision is outside of the purview and authority of the FAA. Furthermore, there is no legal requirement for the FAA to delay issuing a decision on the proposed relocation of the airport in anticipation of future FAA action that is not ripe for decision at this time (decommissioning and release). Similarly, there is no legal requirement for the FAA to delay action on the proposed relocation of the airport pending completion of local decisionmaking regarding the ultimate uses of the existing airport site when and if it is redeveloped. Once FAA's decisions regarding decommissioning and release are ripe for review and approval, and more reliable information is available regarding the redevelopment plan that will be presented to local authorities for approval, additional NEPA evaluation will be undertaken. Regarding the secondary development of the areas surrounding the relocated airport, under the CEQ regulations this is not a connected action. Per the CEQ regulations, a connected action is a federal action that 1) automatically triggers other actions which may require environmental impact statements, 2) cannot or will not proceed unless other actions are taken previously or simultaneously, or 3) are interdependent parts of a larger action and depend on the larger action for their justification. See 40 C.F.R. §1508.25(a)(1). Under all three scenarios for identifying federally connected actions, each individual action being considered "connected" must be a federal action subject to NEPA review. For actions that are not under federal action or control, the description of "connected action" does not apply. Rather, such actions are properly considered under indirect or cumulative impact analyses. In this case, with respect to future development surrounding the relocated airport, the FAA has no authority or purview over such development. These are purely local decisions and do not require action or approval by the FAA. Thus, such development actions are not properly described as connected actions. Rather, development surrounding the relocated airport properly belongs, and has been included in, FAA's analysis of indirect and cumulative impacts. The FAA has presented this analysis based on the best information available regarding future development surrounding the West Bay Site in Section 5.26 of the FEIS.

Comment 5

Building a new airport at the West Bay site would create demand for developing the land around the new airport, where demand for development otherwise would not exist. Other agencies and proponents of building a new airport at the West Bay site have recognized that the airport and development that it will spur are connected actions. For example, the comments of the Florida Department of Environmental Protection emphasized the connection as a benefit, commenting that "[w]ithout the airport relocation, it is highly unlikely that the Bay County Sector Plan and Detailed Specific Area Plan would be implemented..." FEIS Vol. III, DEP comments on DEIS at 4. The Fish and Wildlife Service even commented that a "complete watershed build-out analysis should be conducted for the West Bay alternatives. FEIS Vol. III, FWS comments on DEIS at 3. A PEIS must be performed to fully examine the environmental impacts of these connected actions.

Response

Per CEQ regulations secondary development of the area surrounding the relocated airport is not a federally connected action within the authority of the FAA. See the response to Comment 4 above. Thus, a PEIS to address non-FAA actions is not appropriate.

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- Comment 6** Here, there is significant new information regarding the environmental impacts associated with redeveloping the existing Panama-City Bay County Airport site, which is crucial to providing a complete and objective analysis of environmental impacts of the West Bay site alternatives. In October, 2005, while the FEIS was being prepared, the Airport Sponsor released a *Redevelopment Report*, which includes three comprehensive redevelopment scenarios. At the same time, the Airport Sponsor formally solicited requests for proposals to purchase the existing airport site. This information was neither disclosed, nor analyzed in the draft EIS.
- Response** The Commentor is correct that the Airport Sponsor released a *Redevelopment Report* in October 2005 and that this post-dated the release of the Draft EIS. The FAA was aware of the intent to redevelop the existing airport site and disclosed this information in the DEIS based on the best available information at the time. (See Sections 2.2.2 and Chapter 5 of the DEIS). This information was refined and expanded in the Final EIS, after the release of the *Redevelopment Report* and the greater detail that became available in that report. Therefore, the FAA does not believe that this information would meet the CEQ standard for the development of a Supplemental EIS or affect the FAA's analysis of alternatives considered in the EIS. Finally, the FAA offered the opportunity for public comment on this information with publication of the Final EIS and the information was available to the federal decisionmaker in keeping with the spirit of NEPA.
- Comment 7** Redevelopment of the existing airport is not severable from the construction of a new airport at the West Bay site because the Airport Authority is relying, in part, on sale of the existing airport site in order to finance the construction of a new airport.
- Response** The Commentor is correct that the Airport Sponsor intends to use the proceeds from the sale of the existing airport site to assist in the financing for the relocation of the airport. See the responses to Comments 1 and 4 above regarding the relationship between future FAA decommissioning and release actions and relocation of the airport to the West Bay site.
- Comment 8** While the FAA concedes in the FEIS that the sale and redevelopment of the existing airport site is relevant to its environmental analysis, the FAA improperly ignores the substantial environmental impacts from redevelopment of the existing site, even though such redevelopment would obviously occur within the 2008-2018 time frame of its analysis.
- Response** The FAA analyzed the environmental impacts associated with redevelopment of the existing airport site based on the best information available at the time of publication of the FEIS. See responses to comments 1 and 4 above.
- Comment 9** The FEIS merely "discloses" a number of the substantial environmental impacts to aquatic resources and wildlife that would result from plans to redevelop the existing airport site in the FEIS, but the FAA has not fully evaluated the impacts to aquatic resources, has not consulted with the Fish and Wildlife Service about impacts to threatened and endangered species, and the FEIS fails to include these impacts as impacts that would result from any of the West Bay site alternatives in its comparison of alternatives. The FAA makes it clear that the FEIS assesses the potential environmental impacts from the sponsor's proposed project, which does not include redevelopment of the existing airport site.

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Response See responses to comments 1 and 4 above regarding the relationship between relocation of the airport to the West Bay Site and future FAA actions regarding decommissioning and release at the existing airport. See Sections 5.12.1.4 and 5.12.2.4 of the FEIS for discussion of potential impacts to federal and state-listed species respectively. The commentor is incorrect in stating that FAA did not contact USFWS regarding indirect impacts, particularly redevelopment of the existing site, which will occur as a result of future federal action on decommissioning and release. In fact, the FAA coordinated with the USFWS regarding the fact that federal action on decommissioning and release was not yet ripe and that no redevelopment proposal has been accepted by the Airport Sponsor or submitted for review by appropriate regulatory agencies. As a result, the FAA, in coordination with USFWS, determined the following:

- 1) The potential impacts to listed species resulting from the decommissioning and release of the existing site and its subsequent redevelopment could not be assessed at this time.
- 2) The ultimate redevelopment of the existing airport site is not certain therefore, is not ripe for consultation at this point.

Regarding impacts to aquatic resources, the FAA also coordinated with the NMFS. The FAA's future decommissioning and release actions are not activities that require on-the-ground activities that may adversely affect aquatic resources, such as EFH. Therefore, NMFS concluded that the decommissioning and release by itself should not impact EFH and would not trigger the Magnuson-Stevens Act. See Appendix S of the FEIS. Although redevelopment of the existing airport site is not a part of the Airport Sponsor's proposed project, the FEIS includes reasonably foreseeable impacts of that redevelopment based on the best available information. Contrary to the Commentor's statement these impacts were included when considering the West Bay Site alternatives. See Tables 3-5 and 3-6 of the FEIS.

Comment 10 This is inadequate, results in an arbitrary and capricious finding that the Existing Site and West Bay site have similar environmental impacts, and fails to meet the FAA's and the Corps' obligations under NEPA and the Endangered Species Act.

Response The FAA did not find that the Existing Site and West Bay site have similar environmental impacts. In fact, the EIS states that "... the environmental impacts of all alternatives considered in detail are substantially similar except with respect to certain resource categories, where impacts show a marked difference when comparing existing site alternatives and west bay site alternatives." See Section 3.13.3.1. The remainder of this comment is a legal conclusion to which the FAA believes a response is not necessary.

Comment 11 The FAA's failure to fully evaluate and integrate the substantial environmental impacts related to redevelopment of the existing site is even more shocking considering the fact that the Airport Sponsor abandoned its airport expansion project in 1998 because the proposed project would have resulted in significant adverse environmental impacts to Goose Bayou. See FEIS, Vol. I, Chapter 2.2.1. Information disclosed in the FEIS indicates that redevelopment of the existing site would similarly result in significant adverse environmental impacts to Goose Bayou. However, instead of acknowledging the problems with redevelopment of the existing site, the FAA improperly isolates the impacts of redevelopment.

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Response This comment suggests that FAA has approval authority with respect to the decision to undertake future redevelopment of the existing site. These decisions, including the nature of future uses at the existing site, are outside the purview and authority of the FAA. See the responses to comments 1 and 4 above regarding the relationship between relocation of the airport to the West Bay site and future FAA actions regarding decommissioning and release at the existing airport. Regarding secondary impacts to Goose Bayou as a result of decommissioning and release, see responses to Comments 4 and 9 above.

Comment 12 Clearly, the new information provided in the FEIS about the environmental impacts of redevelopment reveals the importance of further evaluation of the environmental impacts of redevelopment followed by consideration of the complete environmental impacts of the West Bay site alternatives, including a full analysis of the redevelopment impacts. The FAA must issue a SEIS in order to meet its obligations under NEPA to take a “hard look” at the environmental impacts of the proposal to build a new airport at the West Bay site.

Response See the responses to Comments 1, 3, 4, 6, and 9 above.

Comment 13 In the event that the FAA decides to forgo a PEIS or SEIS and issues a ROD that finds that neither site is environmentally superior, its ROD will be arbitrary and capricious and otherwise contrary to law.

Response This comment is a legal conclusion to which the FAA believes a response is not necessary.

**BAYOU TEXAR FOUNDATION • CITIZENS FOR THE BAY •
EMERALD COASTKEEPER • FLORIDA PIRG • FRIENDS OF LAKE JACKSON •
FRIENDS OF PERDIDO BAY • GULF COAST ENVIRONMENTAL DEFENSE •
LAKE JACKSON PROTECTION ALLIANCE • NATURAL RESOURCES DEFENSE
COUNCIL • PANHANDLE CITIZENS COALITION • ST. ANDREW BAY RESOURCE
MANAGEMENT ASSOCIATION • SANTA ROSA SOUND COALITION •
SIERRA CLUB • SOUTH WALTON TURTLE WATCH GROUP**

June 26, 2006

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**Re: Request for further environmental analysis before issuing ROD for relocation of
Panama City Airport**

Dear Ms. Lane and Mr. Hambrick:

Our review of the Final Environmental Impact Statement ("FEIS") issued by the Federal Aviation Administration reveals that the FEIS does not cover the appropriate scope of environmental impacts that will result from the proposal to relocate the Panama City Airport to the West Bay site. The proposal to build a new airport at the West Bay site involves both redeveloping the existing airport site and spurring further development surrounding the new airport. However, the effects of these actions have not been fully evaluated.

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To meet the agencies' obligations under the National Environmental Policy Act ("NEPA") to take a "hard look" and fully evaluate the environmental effects of building a new airport at a greenfield site in West Bay, the FAA and Corps should perform a Programmatic Environmental Impact Statement ("PEIS") to evaluate the cumulative environmental impacts of building a new airport in a Greenfield and developing the old airport site. However, in the event that the agencies disagree with us about their obligation to perform the broader PEIS, the circumstances here demonstrate that at a minimum the FAA must prepare a Supplemental Environmental Impact Statement ("SEIS") to fully evaluate the environmental impacts of redevelopment of the

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existing airport site. Below, we explain why the FAA and Corps must take further action before issuing their Record of Decision to meet their legal obligations under NEPA.

1. Programmatic Environmental Impact Statement

The Council on Environmental Quality's regulations implementing NEPA provide for evaluating "systematic and connected agency decision" in a PEIS. 40 C.F.R. 1508.18(b)(3). CEQ's regulations further require an agency to consider "connected actions" and "cumulative actions" within a single EA or EIS. 40 C.F.R. § 1508.25. The development around the West Bay site and the redevelopment of the existing airport site are geographically related and connected to the proposal to build a new airport at the West Bay site. Thus, a PEIS is the appropriate means to examine the cumulative environmental impacts of all of these related actions.

Neither redeveloping the existing airport, nor developing the land around a new airport at the West Bay site has independent utility. Rather, both redevelopment of the existing airport and development of the 70,000 acres surrounding the proposed West Bay airport site are connected to building a new airport at the West Bay site. Obviously, the existing airport will only be redeveloped if a new airport is built at a different site. EPA's comments on the draft EIS explicitly recognize that "[t]he fate of the existing site is a *connected action* that is important to the overall project." FEIS Vol. III, EPA comments on DEIS at 4 (emphasis added).

Building a new airport at the West Bay site would create demand for developing the land around the new airport, where demand for development otherwise would not exist. Other agencies and proponents of building a new airport at the West Bay site have recognized that the airport and development that it will spur are connected actions. For example, the comments of the Florida Department of Environmental Protection emphasized the connection as a benefit, commenting that "[w]ithout the airport relocation, it is highly unlikely that the Bay County Sector Plan and Detailed Specific Area Plan would be implemented..." FEIS Vol. III, DEP comments on DEIS at 4. The Fish and Wildlife Service even commented that a "complete watershed build-out analysis should be conducted for the West Bay alternatives. FEIS Vol. III, FWS comments on DEIS at 3. A PEIS must be performed to fully examine the environmental impacts of these connected actions.

2. Supplemental Environmental Impact Statement

According to the Council on Environmental Quality's NEPA regulations, a SEIS must be prepared when "(i) [t]he agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) [t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." 40 C.F.R. § 1502.9(c)(1).

Here, there is significant new information regarding the environmental impacts associated with redeveloping the existing Panama City-Bay County Airport site, which is crucial to providing a complete and objective analysis of environmental impacts of the West Bay site alternatives. In October, 2005, while the FEIS was being prepared, the Airport Sponsor released a *Redevelopment Report*, which includes three comprehensive redevelopment scenarios. At the

same time, the Airport Sponsor formally solicited requests for proposals to purchase the existing airport site. This information was neither disclosed, nor analyzed in the draft EIS.

Redevelopment of the existing airport is not severable from the construction of a new airport at the West Bay site because the Airport Authority is relying, in part, on the sale of the existing airport site in order to finance the construction of a new airport.

While the FAA concedes in the FEIS that the sale and redevelopment of the existing airport site is relevant to its environmental analysis, the FAA improperly ignores the substantial environmental impacts from redevelopment of the existing site, even though such redevelopment would obviously occur within the 2008-2018 time frame of its analysis. The FEIS merely “discloses” a number of the substantial environmental impacts to aquatic resources and wildlife that would result from plans to redevelop the existing airport site in the FEIS, but the FAA has not fully evaluated the impacts to aquatic resources, has not consulted with the Fish and Wildlife Service about impacts to threatened and endangered species, and the FEIS fails to include these impacts as impacts that would result from any of the West Bay site alternatives in its comparison of alternatives. The FAA makes it clear that the FEIS assesses the potential environmental impacts from the sponsor’s proposed project, which does not include redevelopment of the existing airport site. This is inadequate, results in an arbitrary and capricious finding that the Existing Site and West Bay site have similar environmental impacts, and fails to meet the FAA’s and the Corps’ obligations under NEPA and the Endangered Species Act.

The FAA’s failure to fully evaluate and integrate the substantial environmental impacts related to redevelopment of the existing site is even more shocking considering the fact that the Airport Sponsor abandoned its airport expansion project in 1998 because the proposed project would have resulted in significant adverse environmental impacts to Goose Bayou. See FEIS Vol. 1, Chapter 2.2.1. Information disclosed in the FEIS indicates that redevelopment of the existing site would similarly result in significant adverse environmental impacts to Goose Bayou. However, instead of acknowledging the problems with redevelopment of the existing site, the FAA improperly isolates the impacts of redevelopment.

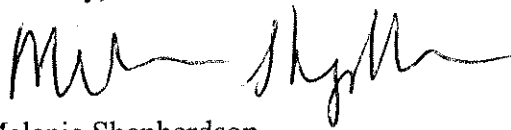
The composite redevelopment scenario includes a 250-slip marina, hotel, golf course, condominiums, and retail. The cursory information disclosed by the FAA indicates that stormwater runoff would result in both short and long-term water quality degradation, impact Goose and Robinson Bayous, and affect the composition of species in the estuary. Dredging for a marina would destroy seagrass beds that provide important habitat for threatened and endangered sea turtles, as well as harm manatees, gulf sturgeon, and oyster beds. Gopher tortoise habitat would also be lost to redevelopment.

Clearly, the new information provided in the FEIS about the environmental impacts of redevelopment reveals the importance of further evaluation of the environmental impacts of redevelopment followed by consideration of the complete environmental impacts of the West Bay site alternatives, including a full analysis of the redevelopment impacts. The FAA must issue a SEIS in order to meet its obligations under NEPA to take a “hard look” at the environmental impacts of the proposal to build a new airport at the West Bay site.

In the event that the FAA decides to forgo a PEIS or SEIS and issues a ROD that finds that neither site is environmentally superior, its ROD will be arbitrary and capricious and otherwise contrary to law. We urge the FAA and the Corps to take further action to comply with their obligations under NEPA as we outlined above before issuing their Record of Decision.

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Sincerely,



Melanie Shepherdson
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Bayou Texar Foundation

Betsy Roberts
Florida Chapter of the Sierra Club

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