

Appendix B
Responses to Comments on the FEIS

Federal Agency
State Agency
Public Organization
Public Individual

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

FEDERAL AGENCY INDEX

Agency	Commentor	Type of Comment	Code #
United States Environmental Protection Agency, Region 4	Heinz Mueller, Chief Office of Policy and Management	Individual Letter	F001
U.S. House of Representatives	F. Allen Boyd, Jr.	Individual Letter	F002
U.S. Senate	Bill Nelson	Individual Letter	F003
U.S. Senate	Mel Martinez	Individual Letter	F004

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Comment 1 EPA finds that the significant wetland and potential secondary impacts of this proposed project have been reasonably addressed through prospective mitigation and additional FEIS documentation.

Response The FAA acknowledges that the EPA finds that the significant wetland and potential secondary impacts have been reasonably addressed based on the proposed mitigation and the additional information provided in the FEIS.

Comment 2 This planning and mitigative effort should continue as Bay County development proceeds. Final wetland compensation for the initial development phase for this project will be identified through the COE's public notice process for the Section 404 individual permit. EPA expects to provide additional review and comment during that process.

Response *USACE provided this response.*
USACE issued the public notice for this project on May 2, 2005. Comments were not received by USACE from EPA in response to the public notice. On July 21, 2006 in response to inquiries from USACE regarding the issuance of the public notice and the above comment, the EPA Region 4 Program Office acknowledged that "the project's conceptual and (presumed) individual Section 404 permits were jointly noticed by the COE in May 2005." Regarding interest on the part of EPA to review the draft mitigation plan, the EPA Region 4 NEPA Program Office stated that they understood from the EPA Region 4 Wetlands Branch that no additional comments would be offered at this time regarding the proposed mitigation plan. The EPA's Wetland Branch confirmed to USACE by email dated July 28, 2006, that the Branch would have no additional comments regarding the proposed Panama City Airport Relocation project or mitigation plan, other than statements made by an EPA staff member, while attending any of the Ecosystem Team Permitting meetings.

Comment 3 It should also be emphasized that prospective future expansion of the relocated airport by the Sponsor would require additional NEPA documentation even though reference was made in the present document to the Sponsor's ultimate development aspirations.

Response *USACE contributed to this response.*
The FAA acknowledges that future NEPA analysis will be required if future expansion is proposed. The FEIS states that "when future development beyond 2018 timeframe is proposed, further evaluation under NEPA will be required". See Section 2.2.2 Volume I of the FEIS. Furthermore, USACE is currently reviewing an application for a multi-phased airport facility within a 50 year time period and is evaluating in detail the Phase I construction. The USACE will disclose the impacts and evaluate in general terms the ultimate proposed project within the framework of a conceptual permit, if issued. The USACE will evaluate in detail, individual construction phases as they are proposed by the Airport Sponsor, over the life of the conceptual permit, if issued. Authorization for the construction of future phases will be evaluated as modifications to the conceptual permit and would require substantial detail, additional NEPA review as well as review under the CWA. See Section 2.6.2, Volume I of the EIS.

Comment 4 To ensure successful implementation of the proposed mitigation in the FEIS, the ROD should fully describe the Sponsor's and FAA's commitments regarding this project for wetlands and all other impacts. These commitments should be as specific as the status of permitting dictates, or as specific as possible for non-permitting issues.

Response The ROD includes all of the Airport Sponsor's mitigation commitments (See Appendix I) and details to the extent they are available regarding the specific mitigation proposals.

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- Comment 5** Similarly, beyond the FEIS, mitigation prescribed in the prospective Section 404 individual permit should also be fully implemented.
- Response** Implementation of the mitigation required by the section 404 permit would be a condition of the ROD as well as a condition of the future grants issued by the FAA.
- Comment 6** Also, once finalized, the FAA response to our air quality modeling concerns being coordinated with EPA should be documented in the FAA ROD.
- Response** Please see responses to Comments 8-10 below.
- Comment 7** Our review of the FEIS determined two concerns on air quality modeling. Our concerns appear to be more modeling issues than an impact on air quality, but should be resolved. Coordination with FAA regarding these concerns is ongoing, with an interim response for each having been provided to EPA. Once these responses are finalized, EPA requests that they be documented in the FAA ROD.
- Response** Please see responses to Comments 8-10 below.
- Comment 8** EPA is concerned that the low number of air quality receptors (less than 10) used in the EDMS modeling for the EAS and West Bay Site was insufficient to predict the maximum air quality concentrations from the airport. It is unclear how such few receptors would allow the determination of where the maximum air concentration impacts would occur.
- Although the FAA final response for this concern is being further coordinated with EPA, we wish to stress that selection of the appropriate number of receptors for airport air quality modeling is a case-by-case judgment for each new or expanded airport proposal. For example, the seven receptors used for the West Bay Site in the present EIS (initial phase development) should not set a precedent for future modeling performed for any PFN site expansion (e.g., ultimate development phase). For most airport projects, particularly for major airports such as ATL, use of many more air quality receptors can be expected to be appropriate. We therefore agree with the FAA interim response that “If the level of operations at PFN increases significantly beyond current forecasts of the air quality attainment status of Bay County changes, it is probable that potential future NEPA analyses at PFN could require a more extensive air quality dispersion analysis, including the definition of additional dispersion receptors.”
- Response** The process of selecting locations for the placement of discrete dispersion modeling receptors for the Panama City-Bay County International Airport (PFN) EIS dispersion analysis began with a review of aerial photos of the Existing Site and the proposed West Bay Site. Aerial photographs were reviewed to identify the locations of persons/households in the vicinity of the Existing and West Bay Site. By superimposing airport plan drawings on the aerial photographs it was also possible to identify publicly accessible areas on-site at both locations. After the review of aerial photography was completed a screening analysis was performed using the EDMS. The purpose of the screening analysis was twofold: (1) to identify on- and off-airport receptor locations at the Existing Site and West Bay Site and (2) identification of the locations at or near both sites with the highest pollutant concentrations. The screening analysis involved the evaluation of 15 receptor locations at each site (i.e., 15 receptors were defined at the Existing Site and 15 receptors were defined for the West Bay Site). Based on the results of these initial evaluations, eight (8) receptors were ultimately defined in EDMS for modeling pollutant concentrations for the Existing Site alternatives, seven (7) receptors were defined in the EDMS for modeling the West Bay Site alternatives. The results of

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Response the screening analysis suggested that the definition of additional receptors around the
Con't Existing Site and West Bay Site would not change the overall conclusions of the analysis.

Dispersion modeling receptors used in the screening analysis and in the final analysis, as documented in the EIS, were sited in locations where people could be affected by airport-generated emissions, including the terminal curbside, airport parking lots and residential neighborhoods in the vicinity of the Existing Site and the West Bay Site. The airfield configuration at the Existing Site and the West Bay Site, as well as the prevailing wind direction, topography, location of residential land uses, and the location of the airport fenceline were considered during the process of defining receptor locations in EDMS. This approach to defining receptor locations is generally consistent with FAA guidance documents, including the *Air Quality Procedures for Civilian Airports and Air Force Bases* (FAA-1997). The *Air Quality Procedures for Civilian Airports and Air Force Bases* (FAA-1997) states the following:

If an overall view of pollutant concentration on and off site is desired, then a grid of receptors should be defined. For many applications, however, only those locations defined as “sensitive” (e.g. where the public is likely to come into contact with emissions) may be modeled in order to reduce the computational requirement. For a complex emissions scenario such as an airport, reducing the number of receptors may be necessary because each receptor defined may add hours to the computational time.¹

According to EPA Final Rule 40 CFR Part 51, receptor locations should be defined in places of expected maximum concentrations. Section 7.2.2 of 40 CFR 51 states

In designing a receptor network, the emphasis should be placed on receptor resolution and location, not the total number of receptors. The selection of receptor sites should be on a case-by-case determination taking into the consideration the topography, the climatology, monitor sites, and the results of initial screening procedures.

NO_x and PM₁₀ concentrations were estimated using the Federal Aviation Administration’s Emission and Dispersion Modeling System (EDMS). As discussed in more detail below, the Environmental Protection Agency’s AERMOD model is integrated into the EDMS software for the purpose of estimating concentrations of criteria pollutants resulting from airport-related sources.

The dispersion analysis for the EIS indicates that concentrations of NO_x and PM₁₀ at both the Existing Site and West Bay Site are expected to be well below the Federal ambient air quality standards (NAAQS) and State ambient air quality standards at all of the receptor locations. The highest concentration levels were predicted to occur at the terminal curbside at both sites. Predicted concentrations of the two pollutants in residential areas surrounding the Existing Site and rural areas surrounding the West Bay Site would be substantially lower than concentrations at the terminal curbside.

The FAA’s airport planning criteria categorizes airports by the type and amount of activity they serve. Airport types are: general aviation, reliever, and commercial service primary (large hub, medium hub, small hub, and nonhub) and commercial service nonprimary. In 2005, PFN had 189,938 enplaned passengers, or 0.028 percent

¹ FAA (1997) *Air Quality Procedures for Civilian Airports and Air Force Bases*. Report FAA-AEE-97-03. US Department of Transportation, Federal Aviation Administration.

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Response of total national enplanements². Therefore, PFN is a nonhub airport. For comparison, in
Con't 2005, Hartsfield-Jackson International Airport (ATL) had 85,907,423 enplaned passengers, or 12.82 percent of total national enplanements. Therefore, ATL is a large hub airport. In FAA EIS analyses, a greater numbers of receptors are defined for large hub airports, such as ATL, than for nonhub airports such as PFN.

It is noted that the FAA has recently completed EISs for Chicago O'Hare International Airport (ORD), Atlanta Hartsfield-Jackson International Airport (ATL), and Phoenix Sky Harbor International Airport (PHX) and that air quality analyses conducted for those EISs included a more extensive set of dispersion modeling receptors than used in the PFN EIS. However, applying a similar level of analysis for the PFN EIS was determined by the FAA not to be justified due to the Bay County's attainment status and the existing and forecast number of aircraft operations at PFN. Both of these considerations are different for PFN than circumstances at ORD, ATL, and PHX.

As shown in **Table 1**, ORD, ATL, and PHX are all located in areas that are designated nonattainment for one or more criteria pollutants. In comparison, Bay County, where PFN is located, is currently in attainment of all of the NAAQS and background concentrations of criteria pollutants are well below the NAAQS.

Table 1

List of U.S. Commercial Service Airports and their Nonattainment and Maintenance Status¹						
Airport Name	ID	EPA Greenname²	Ozone (8-Hour)^{3,4}	CO	PM₁₀	PM_{2.5}⁵
Chicago O'Hare International	ORD	Chicago-Gary-Lake Counties IL-IN	Moderate			V
Hartsfield-Jackson Atlanta International	ATL	Clayton and Fulton Counties GA	Marginal			V
Phoenix Sky Harbor International	PHX	Maricopa County AZ	Subpart 1	Maintenance	Serious	

Notes:

- 1 An empty cell in criteria pollutant columns indicates that the airport is in attainment for that pollutant.
- 2 Greenname is the name of the nonattainment area (from <http://www.epa.gov/oar/oaqps/greenbk>), or the name of one of the areas if there are multiple nonattainment areas.
- 3 The 8-hr. ozone national ambient air quality standard took effect on June 15, 2005, replacing the previous 1-hr. standard.
- 4 "Subpart 1" denotes 8-hour ozone nonattainment areas that are covered under Subpart 1, Part D, Title I of the Clean Air Act. "Subpart 1" is considered nonattainment without a classification. Subpart 1 nonattainment areas are generally affected more by transport emissions than by local emissions. They have to comply with the more general nonattainment requirements of the Clean Air Act, as apart from classified areas with designated severity to their ozone problem (i.e., marginal, moderate, serious, severe, extreme).
- 5 V = in violation of the PM-2.5 standards.

Source: EPA Green Book (as of March 2, 2006)

Sources of pollutant emissions at airports include aircraft, ground support equipment, employee and passenger motor vehicles, and stationary sources. Airports with high

² Domestic enplanements totaled 669.8 million in 2005.

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levels of aircraft operations (particularly passenger air carrier operations) generally produce more pollutant emissions than airports with low levels of aircraft operations due to the greater number of vehicle movements (both aircraft and vehicles on the ground). As such, it is standard practice when conducting dispersion analyses for aviation projects to define a large set of dispersion receptors for airports with high activity levels and located in urbanized areas, and to use a smaller set of receptors at airport with lower activity levels.

Table 2 presents aircraft operations data at PFN, ATL, ORD, and PHX for calendar year 2005. Also shown is a comparison between the operations at PFN and each of the other airports.

Table 2

Type of Operation	Operations by Airport (Calendar Year 2005)						
	PFN		ATL		ORD		PHX
	Aircraft Operations	Aircraft Operations	% of PFN Ops	Aircraft Operations	% of PFN Ops	Aircraft Operations	% of PFN Ops
Air Carrier	4,591	692,165	15077%	620,875	13524%	409,711	8924%
Air Taxi	10,131	275,568	2720%	325,665	3215%	96,235	950%
Total Operations	87,949	980,386	1115%	972,246	1105%	563,536	641%

Source: FAA Air Traffic Activity System (ATADS)

As shown in Table 2, the number of total aircraft operations at PFN is significantly lower than total aircraft operations at ATL, ORD, and PHX. For example, in 2005, there were approximately 11 times as many total operations at ATL and ORD than at PFN. PHX had six times the number of total operations as PFN. The difference in the number of air carrier operations between PFN and these larger airports is even more significant, with ATL, ORD, and PHX reporting air carrier operations in excess of 15 times, 13 times, and 8 times the number of air carrier operations at PFN, respectively. Forecast aircraft operations at PFN, discussed in Section 1.7 of the EIS, are also significantly lower than existing aircraft operations at ATL, ORD, and PHX.

In summary, the process used to define dispersion modeling receptors for use in the PFN EIS dispersion analysis is consistent with available FAA guidance. Dispersion modeling receptors used in EIS dispersion modeling analysis were sited in locations where people could be affected by airport-generated emissions, including the terminal curbside, airport parking lots and residential neighborhoods in the vicinity of the Existing Site and the West Bay Site. The airfield configuration at the Existing Site and the West Bay Site, as well as the prevailing wind direction, topography, location of residential land uses, and the location of the airport fence line were considered during the process of defining receptor locations in EDMS. The number of receptors used in the PFN EIS analysis is appropriate based on available information regarding ambient air quality in Bay County and existing and forecast aircraft activity levels. The results of the screening analysis suggested that the definition of additional receptors around the Existing Site and West Bay Site would not change the overall conclusions of the analysis. It should be noted that the dispersion analysis conducted for the PFN EIS was based on information that was available in 2003/2004 when the analysis was conducted. If the level of operations at PFN increases significantly beyond current forecasts or the air quality attainment status of Bay County changes, it is probable that future NEPA analyses at PFN would require a more extensive air quality dispersion analysis, including the definition of additional dispersion receptors.

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Comment 9 EPA is also concerned that there was minimal discussion on the FEIS on how the inputs for the AERMOD model were developed. The AERMOD modeling system consists of three separate models (AERMAP, AERMET, and AERMOD), none of which were discussed. The AERMOD modeling system is a new model that requires data and inputs that have not previously been used for dispersion modeling applications. Many implementation issues have arisen on how to apply the model. It is critical that the choices used in running this model be detailed and discussed.

Response As noted in the comment, the FAA conducted dispersion analysis using the AERMOD modeling system. This analysis was undertaken despite the fact that Bay County is an attainment area; therefore, such an analysis was not required. Thus, the FAA went beyond the minimum requirements in the EIS to address air quality issues.

Based on the FAA's recent coordination with the EPA regarding the AERMOD model and its implementation, the FAA has provided the following response which addresses inputs and assumptions used in the AERMOD model analysis.

The EPA's AERMOD dispersion model is a steady-state plume model that assumes a Gaussian concentration distribution in both the horizontal and vertical directions in the stable boundary layer. In the convective boundary layer, dispersion is Gaussian in the horizontal direction and bi-Gaussian in the vertical direction. Dispersion models using a Gaussian approximation of pollutants have been applied for many years to emissions from stacks at industrial and utility sites. At airports, stack emissions make up a very small component of the total emissions, with the majority arising instead from mobile sources such as aircraft, passenger vehicles, and ground support equipment. However, the Gaussian approximation is a general-purpose dispersion equation that has been modified for use on mobile source emissions as well as stack emissions.

The AERMOD model is integrated into the EDMS modeling software for the purpose of estimating concentrations of criteria pollutants resulting from airport-related sources. EDMS 4.12 was used to perform the air quality dispersion modeling for airport-related emissions in this EIS. EDMS 4.12 generates input files for use with AERMOD and its meteorological preprocessor, AERMET. The amount of data required to perform a dispersion analysis is significantly greater than the data necessary for an emissions inventory. With a few exceptions, all of the inputs necessary for the emissions inventory are also necessary for dispersion modeling. Because EDMS 4.12 is a model specifically developed for use at airports and air bases, there are several input screens that relate directly to the placement of aircraft and other source activity and movement on the airport (i.e., assignment of coordinates). Required data input includes the creation and specification of runways, queues, taxiways, buildings, and gates. These inputs are converted into a collection of appropriate sources for modeling dispersion in AERMOD.

In addition, EDMS 4.12 facilitates the development of operational profiles, the loading of weather data, and placement of receptors, all of which are required for the AERMOD model to run. AERMOD calculates concentrations for 1-hour periods, and all source types can vary hour by hour in their activity or strength. Therefore, operational profiles for various sources (e.g., aircraft operations, stationary sources, and motor vehicles accessing the airport) are created based on peak daily, monthly, and yearly activity. AERMOD requires a significant amount of weather data in order to accurately calculate pollutant dispersion. Surface data for each hour is required, as well as twice-daily upper-air observations. Running AERMET, AERMOD's meteorological preprocessor, is necessary to transform the various formats of weather data files into the format required by AERMOD. An interface for inputting data into AERMET is integrated into EDMS 4.12. Finally, AERMOD requires the placement of receptors, which are locations at which concentrations are estimated. Through the EDMS interface, receptors

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may be placed in the Cartesian or Polar coordinate system.

EDMS 4.12 does not include a menu for AERMAP, the AERMOD terrain processor. Later versions of EDMS have incorporated a dialogue box for AERMAP, and users can import digital elevation model (DEM) data into the EDMS/AERMOD analysis.

Modeling concentrations in EDMS 4.12 is a three-step process. First, meteorological data is input into the integrated AERMET interface. Next, EDMS pre-processes the emissions for every source for every hour in the weather dataset. The pollutant to be modeled along with various averaging periods can be specified at this time. The result of the second step is the AERMOD input file. Finally, EDMS runs the AERMOD model and produces output files. The output files contain the average concentration of a selected pollutant at each receptor over a specified time period, typically corresponding to the time periods required by NAAQS assessments. Depending on the pollutants modeled, the concentrations are given as once-hour average, eight-hour average, 24-hour average, or annual arithmetic mean.

Input data used in the dispersion modeling conducted for the Existing Site and West Bay Site alternatives in the PFN EIS are described in Section 5.7.2 and Appendix L. The following paragraphs describe the primary inputs used in the three-step process of modeling concentrations in EDMS 4.12.

Meteorological data and AERMET

Meteorological data used in the dispersion modeling included Support Center for Regulatory Atmospheric Modeling (SCRAM) surface data and Upper Air TD-6201 data from the Apalachicola, Florida weather station. Hourly meteorological data, including winds and temperature, were available for four years: 1988, 1989, 1990 and 1991. To run the AERMET weather processor it was also necessary to supply the latitude/longitude coordinate for the Apalachicola weather station, the weather station ID, and the specific dates for the weather data files. Default settings for wind height and surface roughness were used for the PFN EIS analysis.

Development of the AERMOD input file

Section 5.7.2.1 and Appendix L of the EIS describe the inputs to and results of the emissions analysis. In order to develop an AERMOD input file it is also necessary to define (1) operational profiles in EDMS 4.12 for the emission sources, (2) coordinates for emission sources, and (3) dispersion receptor locations. Users must also specify the airport elevation in the AERMOD dialogue box in EDMS 4.12.

EDMS 4.12 allows users to develop operational profiles to simulate variations in airport-related traffic volumes that occur over the course of an entire year (8,760 hours). These operational profiles can be used to define hourly, daily, and monthly peaking characteristics. Operational profiles were defined for airport sources of emissions on the basis of available data, including airline schedules and traffic count data. Data used to develop aircraft operational profiles included: (1) monthly operations summaries; (2) daily operations summaries for the month of May; and (3) hourly operations summaries for 2002.

Coordinates for major area (e.g., parking lots, and passenger gates) and line (e.g., roads, taxiways and runways) sources of NO_x and PM₁₀ pollutant emissions were derived from the ALP for the existing airport and the Draft ALP for the West Bay Site, as provided by the Airport Sponsor. The ALPs provide configurations, lengths, and coordinates of runways and taxiways, commercial aircraft gates, and other airport facilities that are sources of NO_x and PM₁₀ emissions. These coordinates were input into EDMS 4.12.

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Response Con't The process that was followed to define dispersion modeling receptors for the Existing Site and West Bay Site alternatives is described above in Response to Comment 8.

Running AERMOD and AERMOD Output

At the request of the EPA and the Florida Department of Environmental Protection (FDEP), two pollutants were included in the EDMS dispersion analysis: NO_x and PM₁₀. The results of the AERMOD analysis are presented in Section 5.7.2.4.6 of the EIS.

Summary

In summary, dispersion modeling using EDMS/AERMOD is significantly more complex in terms of scope and data input requirements than emissions inventory modeling. Users must (1) specify coordinates for sources of emissions, (2) assign aircraft to runways, runway queues, taxiways, and gate areas, (3) develop appropriate operational profiles for mobile sources, (4) develop weather variables for individual hours, and (5) define other source-specific parameters for each emissions source included in the dispersion analysis. The user is also required to define individual receptors or grids of receptors for pollutant concentration estimation.

Comment 10 For future reference, EPA recommends that information on model input development be better disclosed in FAA EISS, particularly for newer models or applications. Such discussions should typically be more detailed than in Section 5.7.2 of Appendix L of the present FEIS.

Response The FAA acknowledges the comment and notes that it is a comment regarding future documentation and will be taken into consideration for future EIS documents.

Comment 11 **Response 4-2-1a (Bay County Goals)** – We appreciate the inclusion of Tables 5-14 and 5-15 listing West Bay DSAP future land use developments as well as Tables 5-13 listing Bay County goals and objectives for future land use, transportation and economic development. We particularly note and concur with Transportation Objective 4.14 to “[e]liminate incompatible land uses and prohibit airport hazards in the vicinity of airports and landing fields.” EPA considers residences as land use that is non-compatible with airports. Local zoning and other restrictions should prevent the encroachment of residences near the relocated airport in order to avoid the exposure of residences to aircraft noise elevated to 65 DNL and above.

Response The EPA appears satisfied that the development goals of Bay County have been further disclosed in the FEIS.

Comment 12 **Response 4-10-3 (Wetland Success Criteria)** – Appendix R provides the “Sponsor’s Mitigation Commitments”. Regarding wetlands, this includes a commitment for “compensatory mitigation in accordance with agency permits.” Commitments for “preservation and enhancement of wetlands” were also made for endangered species and biotic communities categories. While we appreciate such commitments, they remain generic relative to our request for more specific wetland mitigation success criteria and contingency plans. We further note that excerpts from the “Conceptual Mitigation Plan” were presented in Appendix R, including a “long-term management” section. However, this excerpt too is somewhat generic in terms of specific success criteria and contingency plans. Since our request for specifics is primarily a wetland permitting issue, EPA expects to provide additional review and comment during the COE’s public notice process for the Section 404 individual permit. However, any available additional (post-FEIS) information should already be provided in the FAA ROD.

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- Response** *USACE contributed to this response.*
The FAA has no additional information beyond what was provided in the FEIS. The Mitigation Synopsis in Appendix K of this ROD also includes details regarding restoration targets including thinning densities, fire management, and planting densities. There are also details regarding monitoring that will be conducted to determine if the targeted restoration goals have been met. See response to Comment 2 above regarding the EPA response to the public notice and additional EPA review of the proposed mitigation plan.
- Comment 13** **Response 4-1-5 (Noise)** – We concur with the use of a 10,000-foot buffer around the relocated airport to maintain land use compatible with the airport. We appreciate the response’s clarification that the 10,000-ft buffer is not based on the 50 DNL (or any other) noise contour. However, from a future noise exposure perspective, the ROD should determine the approximate noise contour for the proposed 10,000-ft buffer during operation of the 8,400-ft runway proposed for initial development, using out year (2018) operations data. We assume the buffer boundary would be located outside of the 65 DNL (60-65 DNL?).
- Response** See Figure 5-46 of the FEIS for a depiction of the West Bay Site 8,400 foot Alternative’s 2018 noise contour which includes contours between 60 and 75 DNL. This figure clearly depicts that there is at least a mile distance in all directions from the end of the 60 DNL contour to the buffer using the Airport Sponsor’s forecast for 2018. It is not FAA policy to depict contours below the 60 DNL level particularly, as in this case, where the buffer extends so far beyond the 60 DNL noise contour. Thus, FAA does not agree that it is appropriate or would provide meaningful information for the purposes of the ROD to include the approximate noise contour for the proposed 10,000-foot buffer. The Commentor is correct that the buffer boundary would be located well outside of the 60-65 DNL contour. Furthermore, the grid point analysis as depicted on Figure 5-35 in the FEIS shows that noise exposure in the vicinity of the buffer would be between 50-55 DNL at its closest proximity to the 60 DNL contour.
- Comment 14** **Response 4-2-6 (EAS Redevelopment)** - ... We note that the redevelopment is to include a marina (pg. 5-2) with 250 slips proposed. We wish to emphasize that such marinas should have sufficient circulation to maintain good water quality. This would involve appropriate siting and configuration of the marina and construction of adequate outlets to eliminate dead-end areas for good tidal flushing. Continued coordination with the State of Florida is recommended. In addition, any enhancement or restoration of intertidal areas (which may have been affected by EAS construction and operation) with *Spartina* marsh would be beneficial to Goose Bayou and the Bay system in general. Since we understand (Table 5-75) that planned redevelopment would impact 34.3 acres of wetlands, such intertidal enhancement or restoration might be considered during the Section 404 permit notice review process.
- Response** At this time there is no approved plan for redevelopment. The RFP 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. However, FAA acknowledges EPA’s comments regarding the minimization measures to minimize the impacts associated with marina development and loss of intertidal wetlands. Future development will require review and approval by federal, state and local agencies and these design issues will be addressed at that time if impacts to intertidal areas or a marina is proposed.
- Comment 15** **Response 4-20-7 (VALE)** – We are familiar with the referenced Voluntary Airport Low Emission (VALE) Program and support it as another mechanism to reduce air emissions at airports. We suggest that the status of its potential implementation by the Sponsor be

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discussed in the ROD, as well as its applicability to the proposed project.

Response The Airport Sponsor has not applied at this time for a grant to implement the VALE program. However, such a grant application would not be appropriate until the airport is close to becoming operational. The FAA will continue to encourage the Airport Sponsor to integrate and implement environmentally-friendly measures.

Comment 16 **Response 3-4-10 & 3-4-11 (Screening Process)** – Given the differences in the alternatives screened (EAS expansion alternatives near Goose Bayou versus greenfield alternative sites in inland Bay County), we acknowledge that selection of screening criteria that are valid for both sites is difficult. We agree with other resource agencies that none of the surviving alternatives should involve filling Bay bottoms. However, our concern with using a screening criterion regarding impacts to Bay bottoms is that it automatically prevents those inland alternatives located away from embayments (such as the West Bay site) from being eliminated since they logistically could not impact Bay bottoms (ideally, screening criteria would be common denominators for all considered sites for comparison). We therefore appreciate that other criteria were also used and the requested inclusion of a summary of the Sponsor’s site selection process in the FEIS (pg. 2-3) to supplement the screening analysis.

Response The FAA appreciates the EPA’s acknowledgement of the difficulty in developing the screening criteria for the site selection process. The FAA acknowledges the Commentor’s satisfaction with the additional information regarding the Airport Sponsor’s site selection process provided in the FEIS.

Comment 17 **Response 4-5-24 (Air Toxics)** – We appreciate the text revisions for HAPs (Section 4.7.4 and 5.7.2.6) and the addition of the discussed (2003) FAA overview document entitled “Selected Resource Materials and Annotated Bibliography on the Topic of Hazardous Air Pollutants (HAPs) Associated with Aircraft, Airports, and Aviation” in Appendix L of the FEIS. This document, along with other available literature provides useful, although general (i.e., non-site specific), insight into the question of air toxics emissions from airports.

Response The FAA acknowledges the comment.

Comment 18 **Response 4-5-24 (Air Toxics)** – ...We also note than [sic] an emissions inventory for sources of VOCs and particulates was prepared. We understand that this inventory was for baseline conditions for the EAS, which were expected to be similar to the proposed airport relocation in terms of emission sources. Specifically, page 4-21 states that “[t]he results of the emissions inventory prepared for baseline conditions show that airport emission sources (including aircraft, ground support equipment, stationary sources, and motor vehicle traffic on airport roadways) do not generate large quantities of VOC or particulate emissions.” Data were presented in Appendix L (Air Quality Analysis) and Table 4-8. It should be recognized, however, that the FEIS could have been improved if the inventory was subsequently used to make an evaluation of the potential impacts of air toxics from the Panama City airport project. (Also note that VOCs and particulate matter represent only a subset of air toxics potentially released from airport activities.)

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Response

The EPA indicates that it would have preferred for the FEIS to evaluate potential impacts from air toxics. The FAA has several reasons for its decision not to perform a quantitative HAPs analysis. First, the edge of the limited existing residential development will be approximately 1 mile from the relocated airport. Currently, there are no homes or other receptors neighboring the relocation site. In addition, local land use planning agencies have established an airport buffer area to control incompatible development in the area surrounding the airport which is currently reflected in the comprehensive plan. With the development of the type of zoning anticipated in the environs of the relocated airport, there are not currently and are not expected to be individuals living in the vicinity of the airport who could be exposed to local HAPS emissions in the reasonably foreseeable future. Therefore, there is no potential for a microscale issue. A quantitative HAPS analysis would not provide useful information in these circumstances. Second, the proposed replacement airport is located in an area that is designated attainment for all criteria pollutants. This is relevant because of the area's attainment with the National Ambient Air Quality Standards (NAAQS) and because HAPs generally correlate with volatile organic compounds (VOCs) for gaseous components and with particulates (PM) for metallic components. Table 4-8A contains a list of HAPs associated with aircraft and airport operations. The minor increases found for project VOCs and PM in the emissions inventory provide a clear indication that there would be no local problem with HAPs even if there were adjacent communities. Third, there is no indication that potential HAPs emissions would have reasonably foreseeable significant adverse impacts. In these circumstances, there is no requirement to address incomplete and unavailable information that might bear upon the choice between alternatives pursuant to 40 CFR 1502.22. In contrast, the FAA included or estimated HAPs emissions in recent EISs for proposed projects at O'Hare and LAX. Unlike the proposed relocated airport at issue here, those projects were at busy airports that are located in large metropolitan areas, that are surrounded by densely populated areas, and that are within areas designated nonattainment or maintenance areas for ozone, VOCs, and particulates. Lastly and most importantly, HAPs is an emerging scientific area and FAA headquarters (Office of Environment and Energy) and USEPA headquarters (Office of Air Quality Planning and Standards and the Mobile Source Division in Ann Arbor, Michigan) are working on issues associated with airport-related HAPs emissions. In order to address current limitations of the existing modeling tools and critical input data, the FAA and USEPA are working together with other agencies and organizations to improve HAP databases, particularly for aircraft, and to develop more reliable methodology for airport studies. In addition to research, the FAA is consulting with USEPA on proposed guidance for conducting airport-related HAPs emission inventories. This guidance will supply needed standardization and important information, including: (1) a compendium of aircraft and engine emission profiles; (2) a rating system for HAPs data to describe its reliability based on how the test data were collected and documented; and (3) a list of factors to determine if and how much HAPs analyses is required.

Heinz Mueller
United States Environmental Protection Agency
F001 Individual Letter

Comment 19 **Response 4-5-24 (Air Toxics)** – ...Since the proposed airport relocation project will be located in an undeveloped area of Bay County, it will also provide a unique opportunity to gather baseline information on the potential influence of airport emissions (both construction and routine operation) on a local airshed. Because secondary development can be expected, a monitoring study will allow an understanding of construction, operation, and changing conditions as sources of air toxics are added or otherwise change overtime. Such data will also be useful for additional NEPA documentation developed in response to any substantive future airport development projected by the Sponsor. In short, collection of even a modest amount of air monitoring data for this airport project will provide a unique and effective opportunity to evaluate airport air toxics sources and will further strengthen FAA’s ability to respond to NEPA requirements. Given the one-of-a-kind aspects of this airport’s relocation in a rural area, we encourage FAA to consider a baseline monitoring and assessment program for this airport during the proposed initial development phase or prior to any substantive expansion such as the Sponsor’s projected ultimate development phase. We are therefore pleased to note (pg. 5-102) that “[t]he FAA will consider conducting HAPs analysis if and when future airport development is proposed.” EPA Region 4 will be glad to help in the design of such a study.

Response The FAA acknowledges the comment and has addressed this issue with the Airport Sponsor. The Airport Sponsor has not committed to such baseline monitoring at this time. FAA does not have the authority to require such monitoring. If the Airport Sponsor decides to undertake such baseline monitoring in the future, FAA will inform EPA of this decision.

Comment 20 **Response 4-6-24 (Advanced Treatment)** – Relative to our recommended use of advance treatment for stormwater runoff, we agree that FDEP has been authorized by EPA to administer the National Pollutant Discharge Elimination (NPDES) Permit Program for Florida projects. However, it should be noted that EPA retains NPDES Program oversight.

Response The FAA acknowledges that the EPA has retained oversight of the NPDES Program.

Comment 21 **Response 4-6-35 (Stormwater Impacts)** – We appreciate that additional description of the impacts of redeveloping the EAS were included in Chapter 5 and Appendix V. It is clear, however, that whatever stormwater impacts that are attendant to the reuse of the EAS would be additional to those new stormwater impacts associated with the proposed relocation, its potential future expansion, and its induced development. Therefore, stormwater management at both sites should be maximized with updated technology to minimize point source and non-point source impacts.

Response The FAA agrees with the Commentor that stormwater impacts of a redeveloped existing airport site would be in addition to the stormwater impacts associated with the proposed relocated site. It will be the responsibility of the developer of the existing site to meet state and local requirements for stormwater management.

Comment 22 **Response 4-19-2, 4-19-4 & 4-19-36 (Cumulative and Indirect Impacts)** – As indicated, EPA believes the potential for secondary (indirect) impacts is significant for the airport relocation given its rural location at the West Bay Site. As such, we appreciate the extensive additional discussion since the DEIS in FEIS Section 5.26.

Response The FAA acknowledges that the EPA finds that the secondary (indirect) impacts are significant.

Heinz Mueller
United States Environmental Protection Agency
F001 Individual Letter

Comment 23 Air Quality – We do not agree that air quality would not have a potential project cumulative effect. While the primary air quality project impacts may be from aircraft and associated vehicular emissions, it can be assumed that all indirect development (induced or otherwise) would involve vehicular emissions. The reported transportation projects already underway or proposed (Tables 5-87 & 5-88) suggest such expected traffic increases. Transportation aspects are also frequently mentioned in the list of Bay County goals and objectives (Table 5-13). While the NAAQS attainment status (as discussed on page 5-202) is not expected to change for the counties involved, maintaining this attainment would not necessarily preclude a cumulative effect for air quality as a result of collective airport and secondary emissions.

Response The FAA acknowledges that there will be secondary development in the vicinity of the West Bay site which would result in secondary air quality emission. The FAA did not intend to imply that there would be no cumulative effect as it is clear that emissions from other projects and activities, such as vehicular emissions, would be additive to the emissions of the airport. However, based on the emissions levels calculated for construction and operation of the airport it could easily be deduced that the additive effects would be well below levels of significance.

Comment 24 Induced Impacts – Page 5-201 indicates that Table 5-84 included both indirect impacts of induced development as well as direct impacts of other development that would occur with or without the relocation. Likewise, page 5-204 states that “[r]ather than conduct two separate analyses, the effects of induced development are included within the assessment of cumulative effects...” Although EPA appreciates the difficulties of describing cumulative and indirect effects, Section 5.26 would have been improved if induced impacts would have been dissected out of overall cumulative and impacts attributable to (i.e., those that would likely not occur but for) the proposed airport relocation. As such, this would have been useful to the airport project’s impact assessment, which is the subject of the EIS.

Response The EIS discloses the secondary and cumulative impacts. FAA acknowledges EPA’s comment regarding the opinion that these discussions would have been more clear with separate discussions for secondary and cumulative impacts. However, it appears that EPA is not questioning whether the secondary and cumulative impacts have been adequately addressed.

Comment 25 Table 5-92 – This table summarizes which impact “categories” were considered to have “potential” versus “minimal” cumulative impacts for the considered alternatives. We note that textual discussion was only given for those categories with potential impacts. Section 5.26.4 would have been improved if discussion had also been provided for those categories reported as having “minimal” impact, i.e., why these remaining categories were not considered to have potential cumulative should have been explained. For example, we are uncertain why “surface transportation impacts” would only be considered “minimal” given the list of transportation projects on Tables 5-87 and 5-88. Likewise, the potential to impact “biotic communities/listed species” would seem great for biotic communities, considering the grubbing and clearing associated with most secondary development.

Heinz Mueller
United States Environmental Protection Agency
F001 Individual Letter

Response This comment is correct that Table 5-92 and summary section of the cumulative impacts discussion (Section 5.26.4.4 of the FEIS) incorrectly identified Biotic Communities/Listed Species as minimal cumulative impact. The table should have reflected “potential” for Biotic Communities/Listed Species. However, this mistake in the table and omission in the summary text is at most a harmless error in that a detailed discussion of potential cumulative effects for Biotic Communities/Listed Species is included in the primary analysis section for cumulative impacts. See Section 5.26.3.4. Much is the case for surface transportation impacts. Surface Transportation impacts were misidentified in Table 5-92 and mistakenly omitted from the summary section (Section 5.26.4.4). The surface transportation cumulative impacts were discussed in Section 5.26.3.2.

Comment 26 **Response 5-4-38 (Programmatic EIS)** – Although not entitled as a programmatic EIS, the DEIS was characterized as a “Site Specific Programmatic EIS” in the text (pg. 2-4 of DEIS). While this term may still exist in the FEIS, it was not noticed in the sections referenced in this response (i.e., Sections 1.2.2 and 2.6.2). This apparent inconsistency between the DEIS and FEIS may or may not be important regarding additional NEPA projects for future airport expansions tiering from the present document. We note that Section 1.2.2 concludes that “...subsequent environmental documents evaluating further airport proposals could tier off this FEIS in compliance with NEPA” and provides a NEPA citation (“See 40 CFR 1502.20, 1508.28”). FAA may wish to confirm that subsequent NEPA documents for the relocated airport could indeed tier from the present document consistent with NEPA.

Response The comment is correct that the DEIS was characterized as a “Site Specific Programmatic EIS”. The EPA is also correct that FEIS did not include this language. This language was omitted because a comment was received that suggested this language was not clear. The FAA believes the change is not important as its intent is and has been to utilize this FEIS for future purposes of tiering as appropriate.

Comment 27 **Response 5-5-42 (Level 2 Rationale)** – Perhaps a better reference for this response would have been Section 3.10.7, which provides the requested rationales for each alternative that does not meet Level 2 criteria.

Response The FAA agrees with the EPA.

Comment 28 **Response 4-10-43 (Data Consistency)** – We appreciate the FEIS correction of the slight inconsistencies in DEIS data. We note that the wetlands impacted by the preferred alternative site increased slightly from the DEIS (586.7 ac) to the FEIS (596.2 ac). We assume this is a data refinement rather than an inconsistency.

Response The EPA is correct the differences are a result in data refinement.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL - 3 2006

June 29, 2006

FOO1

Ms. Virginia Lane
Orlando Airports District Office
5950 Hazeltine National Drive / Suite 400
Orlando, Florida 32822-5024

**SUBJ: EPA Review of the Federal Aviation Administration's (FAA)
Final Environmental Impact Statement (FEIS) Dated May 2006,
for the "Proposed Relocation of the Panama City-Bay County
International Airport" (PFN) to a New Site in Bay County, Florida;
CEQ No. 20060191; ERP No. FAA-E51051-FL**

Dear Ms. Lane:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the referenced FAA FEIS on the proposed relocation of the existing PFN airport to a new rural site in Bay County. We appreciate the project coordination that FAA and the Airport Authority/Sponsor (Panama City-Bay County Airport and Industrial District) have provided EPA. Project coordination included an EPA scoping letter (1/17/02), a site visit with the Sponsor (5/1/03), early review of selected preliminary sections of the DEIS, and participation in the State of Florida's Ecosystem Team Permitting (ETP) process which included a multi-agency site visit. Most recently, EPA has provided comments to FAA on the Draft EIS (DEIS) in a letter dated January 20, 2005.

The Sponsor's Proposed Project would relocate the existing airport in Panama City to an inland greenfield site (West Bay Site) in rural Bay County, some 21 roadway miles northwest of the Existing Airport Site (EAS) on Goose Bayou. Relocation would primarily result in wetland and secondary (indirect) impacts. As an alternative to relocation, the EAS could be expanded in several ways; however, this would result in additional aircraft noise, community relocations and/or impacts to Bay bottoms. The relocation versus expansion alternatives would therefore have contrasting impacts commensurate with their rural versus urban locations. The Sponsor's Proposed Project would be phased into a proposed *initial* development phase (addressed by the present EIS) and a potential *ultimate* development phase (disclosed in the EIS for future reference). The proposed first year of operation for the Sponsor's Proposed Project is 2008, with 2018 being the horizon (out) year and 2002 the base year for analyses. In the FEIS, FAA has identified their preferred alternative as the Sponsor's Proposed Project. Specifically, this alternative would relocate PFN to the rural West Bay Site with an 8,400-ft primary runway (extended from 6,304 ft at EAS) and a 5,000-ft crosswind runway (extended from 4,888 ft at EAS).

The primary impacts of the proposed airport relocation are wetland and secondary impacts. Secondary development would be those indirect impacts induced by the relocated airport. Wetland impacts for the West Bay Site total 596.2 acres for the airport for initial development, plus 34.3 acres for the EAS redevelopment (pg. 5-153). However, the conceptual Section 404 permit for ultimate development (50 years) of the West Bay site would impact 1,513 acres of jurisdictional and 17 acres of non-jurisdictional wetlands of the 1,936 acres of total wetlands on the 4,037-acre site (pg. 2-25). An additional 7,279 linear feet of waters of the U.S. would also be impacted.

In our NEPA review of the FEIS, we have focused our comments on wetland and secondary impacts, as well as on our air quality modeling concerns and FAA's responses to our comments on the DEIS (FEIS: Vol. III). These comments are for FAA's consideration in its prospective Record of Decision (ROD). Our specific comments are provided in the *Detailed Comments* enclosure, with our overall conclusions being summarized below.

EPA finds that the significant wetland and potential secondary impacts of this proposed project have been reasonably addressed through prospective mitigation and additional FEIS documentation. We note that considerable federal, state and county effort has been devoted to the planned development of Bay County, which includes enhancement of large mitigation buffer areas. Development planning includes the overall West Bay Sector Plan (75,000 ac) and smaller specific area plans (Airport DSAP and West Bay DSAP). This planning and mitigative effort should continue as Bay County development proceeds. Final wetland compensation for the initial development phase for this project will be identified through the COE's public notice process for the Section 404 individual permit. EPA expects to provide additional review and comment during that process. Wetland mitigation of secondary impacts would be addressed through separate Section 404 permitting at the individual project level or consistent with Sector Planning. This would include the wetland impacts (34.3 ac) of the proposed redevelopment for the EAS. It should also be emphasized that prospective future expansion of the relocated airport by the Sponsor would require additional NEPA documentation even though reference was made in the present document to the Sponsor's ultimate development aspirations.

To ensure successful implementation of the proposed mitigation in the FEIS, the ROD should fully describe the Sponsor's and FAA's commitments regarding this project for wetlands and all other relevant impacts. These commitments should be as specific as the status of permitting dictates, or as specific as possible for non-permitting issues. Similarly, beyond the FEIS, mitigation prescribed in the prospective Section 404 individual permit should also be fully implemented. Also, once finalized, the FAA responses to our air quality modeling concerns being coordinated with EPA should be documented in the FAA ROD.

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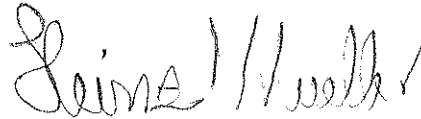
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Should you have questions regarding these comments, feel free to contact Chris Hoberg of my staff at 404/562-9619 or hoberg.chris@epa.gov. We request a copy of the FAA ROD for our files.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller". The signature is written in a cursive style with some capital letters.

Heinz J. Mueller, Chief
Office of Policy and Management
NEPA Program Office

Enclosure – *Detailed Comments*

cc: Jackie Sweatt-Essick – FAA: College Park, GA

DETAILED COMMENTS

EPA offers the following air quality modeling comments and our comments on FAA's responses to Agency comments on the DEIS.

Air Quality Modeling Concerns

Our review of the FEIS determined two concerns on air quality modeling. Our concerns appear to be more modeling issues than an impact on air quality, but should be resolved. Coordination with FAA regarding these concerns is ongoing, with an interim response for each having been provided to EPA. Once these responses are finalized, EPA requests that they be documented in the FAA ROD. Additional coordination with EPA should proceed through Brenda Johnson at 404/562-9037 and johnson.brenda@epa.gov of the EPA Region 4 Air, Toxics and Pesticides Division. Our concerns are as follows:

* Air Quality Receptors - EPA is concerned that the low number of air quality receptors (less than 10) used in the EDMS modeling for the EAS and West Bay Site was insufficient to predict the maximum air quality concentrations from the airport. It is unclear how such few receptors would allow the determination of where the maximum air concentration impacts would occur.

Although the FAA final response for this concern is being further coordinated with EPA, we wish to stress that selection of the appropriate number of receptors for airport air quality modeling is a case-by-case judgement for each new or expanded airport proposal. For example, the seven receptors used for the West Bay Site in the present EIS (initial phase development) should not set a precedent for future modeling performed for any PFN site expansion (e.g., ultimate development phase). For most airports projects, particularly for major airports such as ATL, use of many more air quality receptors can be expected to be appropriate. We therefore agree with FAA interim response that "If the level of operations at PFN increases significantly beyond current forecasts or the air quality attainment status of Bay County changes, it is probable that potential future NEPA analyses at PFN could require a more extensive air quality dispersion analysis, including the definition of additional dispersion receptors."

* AERMOD Modeling Inputs - EPA is also concerned that there was minimal discussion in the FEIS on how the inputs for the AERMOD model were developed. The AERMOD modeling system consists of three separate models (AERMAP, AERMET and AERMOD), none of which were discussed. The AERMOD modeling system is a new model that requires data and inputs that have not previously been used for dispersion modeling applications. Many implementation issues have arisen on how to apply this model. It is critical that the choices used in running this model be detailed and discussed.

The FAA final response for this concern is also being further coordinated with EPA. For future reference, EPA recommends that information on model input development be better disclosed in FAA EISs, particularly for newer models or applications. Such

discussions should typically be more detailed than in Section 5.7.2 of Appendix L of the present FEIS. 10

Comments on FAA Responses

► **Response 4-2-1a (Bay County Goals)** – We appreciate the inclusion of Tables 5-14 and 5-15 listing West Bay DSAP future land use developments as well as Table 5-13 listing Bay County goals and objectives for future land use, transportation and economic development. We particularly note and concur with Transportation Objective 4.14 to “[e]liminate incompatible land uses and prohibit airport hazards in the vicinity of airports and landing fields.” EPA considers residences as land use that is non-compatible with airports. Local zoning and other restrictions should prevent the encroachment of residences near the relocated airport in order to avoid the exposure of residences to aircraft noise elevated to 65 DNL and above. 11

► **Response 4-10-3 (Wetland Success Criteria)** – Appendix R provides the “Sponsor’s Mitigation Commitments”. Regarding wetlands, this includes a commitment for “compensatory mitigation in accordance with agency permits.” Commitments for “preservation and enhancement of wetlands” were also made for endangered species and biotic communities categories. While we appreciate such commitments, they remain generic relative to our request for more specific wetland mitigation success criteria and contingency plans. We further note that excerpts from the “Conceptual Mitigation Plan” were presented in Appendix R, including a “long-term management” section. However, this excerpt too is somewhat generic in terms of specific success criteria and contingency plans. 12

Since our request for specifics is primarily a wetland permitting issue, EPA expects to provide additional review and comment during the COE’s public notice process for the Section 404 individual permit. However, any available additional (post-FEIS) information should already be provided in the FAA ROD.

► **Response 4-1-5 (Noise)** – We concur with the use of a 10,000-ft buffer around the relocated airport to maintain land use compatible with the airport. We appreciate the response’s clarification that the 10,000-ft buffer is not based on the 50 DNL (or any other) noise contour. However, from a future noise exposure perspective, the ROD should determine the approximate noise contour for the proposed 10,000-ft buffer during operation of the 8,400-ft runway proposed for initial development, using out year (2018) operations data. We assume the buffer boundary would be located outside of the 65 DNL (60-65 DNL?). 13

► **Response 4-2-6 (EAS Redevelopment)** – Considerable information regarding redevelopment of the EAS (after proposed airport decommissioning) was provided in the FEIS (Section 5.1 and Appendix V) and through discussion with FAA in December 2005. We note that the redevelopment is to include a marina (pg. 5-2) with 250 slips proposed. We wish to emphasize that such marinas should have sufficient circulation to maintain good water quality. This would involve appropriate siting and configuration of the 14

marina and construction of adequate outlets to eliminate dead-end areas for good tidal flushing. Continued coordination with the State of Florida is recommended. In addition, any enhancement or restoration of intertidal areas (which may have been affected by EAS construction and operation) with *Spartina* marsh would be beneficial to Goose Bayou and the Bay system in general. Since we understand (Table 5-75) that planned redevelopment would impact 34.3 acres of wetlands, such intertidal enhancement or restoration might be considered during the Section 404 permit notice review process.

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► **Response 4-20-7 (VALE)** – We are familiar with the referenced Voluntary Airport Low Emissions (VALE) Program and support it as another mechanism to reduce air emissions at airports. We suggest that the status of its potential implementation by the Sponsor be discussed in the ROD, as well as its applicability to the proposed project.

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► **Response 3-4-10 & 3-4-11 (Screening Process)** – Given the differences in the alternatives screened (EAS expansion alternatives near Goose Bayou versus greenfield alternative sites in inland Bay County), we acknowledge that selection of screening criteria that are valid for both sites is difficult. We agree with other resource agencies that none of the surviving alternatives should involve filling Bay bottoms. However, our concern with using a screening criterion regarding impacts to Bay bottoms is that it automatically prevents those inland alternatives located away from embayments (such as the West Bay site) from being eliminated since they logistically could not impact Bay bottoms (ideally, screening criteria would be common denominators for all considered sites for comparison). We therefore appreciate that other criteria were also used and the requested inclusion of a summary of the Sponsor’s site selection process in the FEIS (pg. 2-3) to supplement the screening analysis.

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► **Response 4-5-24 (Air Toxics)** – We appreciate the text revisions for HAPs (Sections 4.7.4 and 5.7.2.6) and the addition of the discussed (2003) FAA overview document entitled “Selected Resource Materials and Annotated Bibliography on the Topic of Hazardous Air Pollutants (HAPs) Associated with Aircraft, Airports, and Aviation” in Appendix L of the FEIS. This document, along with other available literature provides useful, although general (i.e., non-site specific), insight into the question of air toxics emissions from airports.

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We also note that an emissions inventory for sources of VOCs and particulates was prepared. We understand that this inventory was for baseline conditions for the EAS, which were expected to be similar to the proposed airport relocation in terms of emission sources. Specifically, page 4-21 states that “[t]he results of the emissions inventory prepared for baseline conditions show that airport emission sources (including aircraft, ground support equipment, stationary sources, and motor vehicle traffic on airport roadways) do not generate large quantities of VOC or particulate emissions.” Data were presented in Appendix L (Air Quality Analysis) and Table 4-8. It should be recognized, however, that the FEIS could have been improved if the inventory was subsequently used to make an evaluation of the potential impacts of air toxics from the Panama City airport project. (Also note that VOCs and particulate matter represent only a subset of air toxics potentially released from airport activities.)

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Since the proposed airport relocation project will be located in an undeveloped area of Bay County, it will also provide a unique opportunity to gather baseline information on the potential influence of airport emissions (both construction and routine operation) on a local airshed. Because secondary development can be expected, a monitoring study will allow an understanding of construction, operation, and changing conditions as sources of air toxics are added or otherwise change over time. Such data will also be useful for additional NEPA documentation developed in response to any substantive future airport development projected by the Sponsor. In short, collection of even a modest amount of air monitoring data for this airport project will provide a unique and effective opportunity to evaluate airport air toxics sources and will further strengthen FAA's ability to respond to NEPA requirements. Given the one-of-a kind aspects of this airport's relocation in a rural area, we encourage FAA to consider a baseline monitoring and assessment program for this airport during the proposed initial development phase or prior to any substantive expansion such as the Sponsor's projected ultimate development phase. We are therefore pleased to note (pg. 5-102) that "[t]he FAA will consider conducting HAPs analysis if and when future airport development is proposed." EPA Region 4 will be glad to help in the design of such a study.

19

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► **Response 4-19-2, 4-19-4 & 4-19-36 (Cumulative and Indirect Impacts)** – As indicated, EPA believes the potential for secondary (indirect) impacts is significant for the airport relocation given its rural location at the West Bay Site. As such, we appreciate the extensive additional discussion since the DEIS in FEIS Section 5.26. Several impact categories were well researched and described. We offer the following remaining comments regarding indirect/induced and cumulative impacts:

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* Air Quality – We do not agree that air quality would not have a potential project cumulative effect. While the primary air quality project impacts may be from aircraft and associated vehicular emissions, it can be assumed that all indirect development (induced or otherwise) would involve vehicular emissions. The reported transportation projects already underway or proposed (Tables 5-87 & 5-88) suggest such expected traffic increases. Transportation aspects are also frequently mentioned in the list of Bay County

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goals and objectives (Table 5-13). While the NAAQS attainment status (as discussed on page 5-202) is not expected to change for the counties involved, maintaining this attainment would not necessarily preclude a cumulative effect for air quality. EPA believes there would be a potential cumulative effect for air quality as a result of collective airport and secondary emissions.

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24

* Table 5-92 – This table summarizes which impact “categories” were considered to have “potential” versus “minimal” cumulative impacts for the considered alternatives. We note that textual discussion was only given for those categories with potential impacts. Section 5.26.4 would have been improved if discussion had also been provided for those categories reported as having “minimal” impact, i.e., why these remaining categories were not considered to have potential cumulative should have been explained. For example, we are uncertain why “surface transportation impacts” would only be considered “minimal” given the list of transportation projects on Tables 5-87 and 5-88. Likewise, the potential to impact “biotic communities/listed species” would seem great for biotic communities, considering the grubbing and clearing associated with most secondary development.

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F. Allen Boyd, Jr.
U.S. House of Representatives
F002 Individual Letter

Comment 1 I am familiar with the proposed project and a number of the alternatives that have been analyzed over the past several years. As I have stated before, I believe that the Northwest Florida region and its transportation, economic development and environmental needs are best served by the relocation of the Panama City-Bay County International Airport to the proposed location on CR 388.

I have been pleased that the Airport Authority and the Bay County Commission have been forward-thinking in the creation of the preservation area around West Bay and its tributaries. The recent improvements to State Road 77 and State Road 79, along the boundaries of the airport's West Bay Sector, will provide easy access to the airport for the citizens across the region.

Response Thank you for your participation in the EIS process. Your support of the relocation of the Panama City-Bay County International Airport is noted.

Comment 2 I would appreciate the FAA's support of this relocation project to the proposed CR 388 site which will serve as an impetus for a variety of improvements in a several county area. I believe my constituents will be well-served in this project becoming a reality in the near future.

Response Section 7.3 of the ROD identifies the FAA's Selected Alternative which is the relocation of the Panama City-Bay County International Airport to the West Bay site with an 8,400 foot primary runway.

JUL - 3 2006

ALLEN BOYD
SECOND DISTRICT, FLORIDA
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SUBCOMMITTEES:
AGRICULTURE AND RELATED AGENCIES
MILITARY QUALITY OF LIFE AND VETERANS
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PANAMA CITY, FL 32401
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June 29, 2006

F002

The Honorable Marion C. Blakey
Administrator
Federal Aviation Administration
800 Independence Avenue, SW, Ste. 1010
Washington, DC 20591

Reference: Proposed Relocation of Panama City-Bay County, Florida
International Airport

Dear Administrator Blakey,

Recently the Federal Aviation Administration published the Environmental Impact Statement which considered the relocation of the Panama City-Bay County International Airport, which is located in my Congressional District.

I am familiar with the proposed project and a number of the alternatives that have been analyzed over the past several years. As I have stated before, I believe that the Northwest Florida region and its transportation, economic development and environmental needs are best served by the relocation of the Panama City-Bay County International Airport to the proposed location on CR 388.

I have been pleased that the Airport Authority and the Bay County Commission have been forward-thinking in the creation of the preservation area around West Bay and its tributaries. The recent improvements to State Road 77 and State Road 79, along the boundaries of the airport's West Bay Sector, will provide easy access to the airport for the citizens across the region.

I would appreciate the FAA's support of this relocation project to the proposed CR 388 site which will serve as an impetus for a variety of improvements in a several county area. I believe my constituents will be well-served in this project becoming a reality in the near future.

Sincerely,

F. Allen Boyd, Jr.
F. Allen Boyd, Jr.
Member of Congress

FAB/js

Bill Nelson
U.S. Senate
F003 Individual Letter

Comment 1 While the Federal Aviation Administration reviews the Final Environmental Impact Statement on the relocation of the Panama City Airport, I write to express my support for the conclusion reached with the study which selects the relocation of the airport as the preferred alternative.

As you are aware, I have written to you previously at earlier stages of this project history and support a new airport for the following reasons: improved air safety, eliminating possible conflicts with air traffic at Tyndall Air Force Base, enhancing the capacity of the national system, and providing much-needed air service options to an underserved area of our state. On a more local basis, the new location will reduce noise, traffic congestion and other disruptions in the neighboring residential community, and also facilitate economic development in Bay County.

Response Thank you for your participation in the EIS process. Your support of the relocation of the Panama City-Bay County International Airport is noted.

Comment 2 I look forward to the issuance of a favorable Record of Decision and subsequent Letter of Intent so that the construction of a new facility can begin as soon as possible. This is a critical element of efforts to improve capacity and air safety for those traveling to and from Northwest Florida.

Response Section 7.3 of the ROD identifies the FAA's Selected Alternative which is the relocation of the Panama City-Bay County International Airport to the West Bay site with an 8,400 foot primary runway.

The FAA understands that the state has issued a Notice of Intent to issue an Ecosystem Management Agreement (EMA) and all related state environmental permits for the FAA's preferred alternative. The EMA has not yet been issued. In addition, the USACE has not taken final action under its permitting responsibilities. Therefore, the ROD is not the final environmental action required for project construction.

JUN 27 2006

FOO3



United States Senate

WASHINGTON, DC 20510-0905

BILL NELSON
FLORIDA

June 19, 2006

The Honorable Marion C. Blakey
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Suite 1010
Washington, DC 20591

Dear Administrator Blakey:

While the Federal Aviation Administration reviews the Final Environment Impact Statement on the relocation of the Panama City Airport, I write to express my support for the conclusion reached within the study which selects the relocation of the airport as the preferred alternative.

As you are aware, I have written to you previously at earlier stages of this project history and support a new airport in the Panama City area for the following reasons: improved air safety, eliminating possible conflicts with air traffic at Tyndall Air Force Base, enhancing the capacity of the national system, and providing much-needed air service options to an underserved area of our state. On a more local basis, the new location will reduce noise, traffic congestion and other disruptions in the neighboring residential community, and also facilitate economic development in Bay County.

I look forward to the issuance of a favorable Record of Decision and subsequent Letter of Intent so that the construction of a new facility can begin as soon as possible. This is a critical element of efforts to improve capacity and air safety for those traveling to and from Northwest Florida.

Thank you for your consideration and continued dialogue regarding this project.

Sincerely,

Cc: Ms. Catherine Lang, Acting Associate Administrator
Ms. Carolyn Blum, Regional Administrator
Mr. Rusty Chapman, Airports Division Manager
Mr. Dean Stringer, Manager

Mel Martinez
U.S. Senate
F004 Individual Letter

Comment 1

I support the option of relocating the Panama City-Bay County International Airport facilities to the proposed site on County Road 388 near State Road 79. This option maximizes the opportunities for future expansion of the airfield while providing what appears to be an enormous environmental gain around West Bay.

The local community has worked diligently with state and federal regulators, the local governments, the Florida Legislature and Congress in efforts to improve its transportation alternatives as well as improving the nation's air traffic network. The proposed relocation will provide opportunities for this region unlike any time in its past.

Response

Thank you for your participation in the EIS process. Your support of the relocation of the Panama City-Bay County International Airport is noted.

United States Senate

WASHINGTON, DC 20510-0906

June 29, 2006

FOOY

The Honorable Marion C. Blakey
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Suite 1010
Washington, DC 20591

Dear Administrator Blakey,

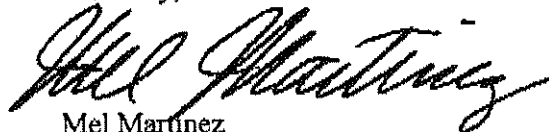
In May 2006, the Federal Aviation Administration published the Final Environmental Impact Statement for the proposed relocation of the Panama City-Bay County International Airport located in Northwest Florida. I understand that the FAA has considered a number of alternatives to address the constraints of the current airport facilities in Bay County.

I support the option of relocating the Panama City-Bay County International Airport facilities to the proposed site on County Road 388 near State Road 79. This option maximizes the opportunities for future expansion of the airfield while providing what appears to be an enormous environmental gain around West Bay.

The local community has worked diligently with state and federal regulators, the local governments, the Florida Legislature and Congress in efforts to improve its transportation alternatives as well as improving the nation's air traffic network. The proposed relocation will provide opportunities for this region unlike any time in its past.

As you know, I have been a supporter of this proposed project for Northwest Florida, and I believe that now is the time to make this project a reality. Thank you for your continued diligence to improve transportation in the state of Florida.

Sincerely,



Mel Martinez
United States Senator