

John Robert Middlemas
I005 Individual Letter

Comment 1

First of all, it is not clear to me why the FAA felt that the FEIS needed to deal at all with the redevelopment of the existing site, particularly in the way that it did. Your report suggests that you felt compelled to do so for “disclosure purposes,” whatever that means. The sponsor’s RFP provided the disclosure; the FEIS merely comments on the RFP.

Some have suggested that the FEIS should include the information on the redevelopment plans because of the cumulative environmental effects of the construction of the new airport and redevelopment of the existing airport site. That may be a valid position because of the proximity of the two project sites, which both are on St. Andrew Bay. But the FAA’s comments mention nothing about such cumulative effects.

Rather, the FEIS concocted a “composite redevelopment scenario” and then listed “potential impacts of the redevelopment scenario.” First, the composite scenario is meaningless. If the FAA is going to suggest environmental impacts, it should discuss each development option separately. There is no value at all in listing the potential effects of a “scenario” that will never exist.

Response

In November 2005, the Airport Sponsor published a Request for Proposals (RFP) soliciting bids for possible sale and redevelopment of the existing site in the event the FAA approved a West Bay site alternative. This RFP and an associated document called the *Background Analysis and Master Planning Report for Redevelopment* (Redevelopment Report) include information regarding three potential development options at the Existing Site, including potential land uses, intensities of development, and conceptual master plan graphics. Redevelopment of the existing site is not part of the Airport Sponsor’s proposed project. However, NEPA requires the FAA to disclose and analyze future actions that are reasonably foreseeable regardless of the project proponent.

The FAA acknowledges that there will be future development at the existing airport site, however, the precise form of that redevelopment is yet unknown. The three scenarios presented in the RFP represent only three proposals of a potentially limitless number of redevelopment options, any of which might be approved. However, NEPA does not require FAA to undertake an analysis of every conceivable permutation when conducting an analysis of reasonably foreseeable future actions relevant to the EIS analysis. Evaluation of each of the three RFP scenarios would be an exercise in analysis with no more meaningful substantive value than what FAA did -- addressing a conservative analysis based on best available information existing at the time of the FEIS, *i.e.*, a composite of the three. Secondary and cumulative impacts from redevelopment of the existing site were disclosed to the extent practicable based on available information. See Section 5.26 of the FEIS. The FAA believes the approach taken was reasonable and in keeping with the spirit of NEPA, where information is not sufficient to prepare a more definitive analysis.

Comment 2

Because of this, the FEIS is flawed. The FAA either should amend the report by removing all comment on the existing site, or the FAA should take the time and effort to produce a complete, scientifically based report on the certain adverse effects that will result from the site’s redevelopment.

Response

Please see the Response to Comment 1 above.

JUL - 3 2006

June 30, 2006

1005

Ms. Virginia Lane
Environmental Specialist
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822

Re: Final Environmental Impact Statement on the proposed relocation of the Panama City-Bay County International Airport

Dear Ms. Lane:

I wish to comment on one segment of the FAA's Final Environmental Impact Statement (FEIS) which unfortunately was given such brief and confusing treatment that the FEIS would have been better without mentioning it at all. I refer to the report's comments on the sponsor's Request for Proposals (RFP) soliciting bids for the possible sale and redevelopment of the existing airport site.

First of all, it is not clear to me why the FAA felt that the FEIS needed to deal at all with the redevelopment of the existing site, particularly in the way that it did. Your report suggests that you felt compelled to do so for "disclosure purposes," whatever that means. The sponsor's RFP provided the disclosure; the FEIS merely comments on the RFP.

Some have suggested that the FEIS should include information on the redevelopment plans because of the cumulative environmental effects of the construction of the new airport and the redevelopment of the existing airport site. That may be a valid position because of the proximity of the two project sites, which both are on St. Andrew Bay. But the FAA's comments mention nothing about such cumulative effects.

Rather, the FEIS concocted a "composite redevelopment scenario" and then listed "potential impacts of the redevelopment scenario." First, the composite scenario is meaningless. If the FAA is going to suggest environmental impacts, it should discuss each development option separately. There is no value at all in listing the potential effects of a "scenario" that will never exist.

Secondly, the FAA obviously gave little thought and less effort in determining the potential impacts. A student in a high school environmental studies class could have come up with a more thoughtful report on impacts.

It seems to me that the FAA included comments on redevelopment of the existing site almost as an afterthought. Perhaps the FAA feared that some individuals or organizations

would use an omission of such comments as grounds to criticize the report and to gain ammunition for efforts to stop the relocation of the airport.

By creating this odd composite scenario, the FAA can claim that it dealt with the potential environmental damage resulting from certain redevelopment of the existing site, and recommended construction of the new airport, notwithstanding the "possible" adverse effects of redevelopment of the present site.

This is sorry treatment of the very important issue of the environmental damage that can result from intense development of the present airport site, damage to one of the most precious and productive bays in Florida. In its obvious determination to recommend the new airport, the FAA seems unwilling to honestly report the real, not "possible," adverse effects of intense development of the existing site.

Because of this, the FEIS is flawed. The FAA either should amend the report by removing all comment on the existing site, or the FAA should take the time and effort to produce a complete, scientifically based report on the certain adverse effects that will result from the site's redevelopment.

} 2

Sincerely,

John Robert Middlemas

718 Bunkers Cove Road
Panama City, FL 32401

Robert F. Roscow
I006 Individual Letter

Comment 1 Previously I submitted a hard copy as well as computer files on this DEIS. For some reason it appears that all my charts, data, articles, GIS maps, aerials, etc. were omitted from the FEIS that was just published.

I am attaching a hard copy of much of that previous work but ran into computer problems so have been unable to reproduce the original submission in its entirety. All that material can be provided again if necessary, however from what I have seen it was received by the FAA and the above materials simply omitted for whatever reason.

Response Responses to the Commentor's comments on the DEIS are included in Volume IV of the FEIS. The Commentor is correct that the attachments to his comments were not included in the FEIS. They are included in this ROD.

1006

JUL - 5 2006

Robert F. Roscow
127 Woodlawn Street
Hamden, CT 06517
July 3, 2006

Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Dr, Suite 400
Orlando, Florida 32822-5024

Attention: Ms. Virginia Lane, Environmental Specialist

Subject: Comments on Final Environmental Impact Statement (FEIS) for the Proposed Relocation of the Panama City-Bay County International Airport (PFN), Panama City, FL, and Request for Supplemental and/or Programmatic EIS

Previously I submitted a hard copy as well as computer files on this DEIS. For some reason it appears that all my charts, data, articles, GIS maps, aerials, etc. were omitted from the FEIS that was just published.

I am attaching a hard copy of much of that previous work but ran into computer problems so have been unable to reproduce the original submission in its entirety. All that material can be provided again if necessary, however from what I've seen it was received by the FAA and the above materials simply omitted for whatever reason. I believe that further discussion of this project will now be handled in the courts.

Sincerely,



Robert F. Roscow

Enclosures:

Reproduction of original hard copy submission

**Written Comments on the Federal Aviation Administration (FAA) Proposed
Relocation of the Panama City-Bay County International Airport Draft
Environmental Impact Statement (DEIS)**

By

Robert F. Roscow
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After reviewing the DEIS for the Panama City International Airport Relocation I have the following comments. For clarity I will list the comments numerically and supporting or referenced material will follow those specific comments.

Comment 01:

Throughout the DEIS it is stated that the St. Joe Company, a publicly traded corporation, is “donating” the land for the proposed airport site as well as offering to “donate” other lands necessary for the mitigation of any wetland impacts on the airport “donation site.” Typically, a donation is free, no strings attached. I can cite all sorts of dictionary references but I believe that the association of free and unencumbered is commonly associated with the word “donation.” If one gives money to the National Heart Foundation, there is no guarantee or contractual agreement, explicit or implicit, that if you needed a donor heart that you would get one.

Such is not the case here. The use of the word “donation” for what in business terms would be clearly labeled a conditional transfer of property in trade for receiving funding for an international airport facility financed predominantly by the public is clearly misleading. Only if the FAA approves the project and the state and federal governments commit to building and funding the airport will this property be transferred for “free.” That’s not exactly a “free lunch” any way you cut it.

Additionally, no where in the DEIS could I find documentation that showed the relationship between the donor’s land holdings and the donor’s airport site that might help clarify their less than philanthropic purpose. Not only is all the land around the airport owned by St. Joe for all intents and purposes, and all the land in the land use planning Sector Plan approved by Bay County, but also lands west of all this property that are not even discussed in the DEIS. (See *Map 12 West Bay Sector Plan Overlay Map* and note that St. Joe owns as much or more land west of this area.) Why isn’t all the land St. Joe owns west of the Sector Plan part of the study? Will this land remain pine trees and wetlands or villages and industrial parks or a mix? These are major infrastructure considerations that are completely avoided.

It is no secret that St. Joe purchased the property to be donated long before many of the people reviewing this DEIS were even born. Their actual cost is next to nothing yet their return on

investment gained from this nominal donation is astronomical. If such donations become the policy of the federal government for siting and financing airports, we will be building airports in wheat fields in Kansas next. What is the difference?

The Sponsor, Panama City International Airport Authority, appears to be merely a front for St. Joe. St. Joe is asking the state and federal governments to front a major infrastructure cost for lands that they presently have in silviculture or cannot utilize because they are wetlands and economically not feasible to transform to silviculture and literally transform into a city. The relationship of this "new city" has technically very little to do with Panama City and a great deal to do with St. Joe's holdings, i.e., all of the lands in the study area. How in the world can anyone contend academically from an urban design standpoint that building an airport literally the farthest distance away from the population centroid of a long existing metro area is "good" design? The proposed airport is literally across the bay in the middle of nowhere: a matrix of lowlands, wetlands, and pine trees.

If St. Joe truly wants to "donate" the land for an airport or some other similar use, then they can right now. Their massive team of lawyers can draft a document that irrevocably turns over the property to the county, airport authority or state for that purpose and if the need is documented in the future that there is indeed a need for such a facility, the land is available as well as the upfront planning to avoid incompatible usage of surrounding properties. They have already received most of the regulatory planning entitlements necessary; they only need to commit. It appears though that they want to have their cake and eat it too. That mentality should not be or become public policy.

Attached are documents showing the extent of St. Joe's land holdings in the immediate (meaning physically adjacent) area, some mere 150,000 acres (the size of some of Florida's smaller counties almost) give or take 30,000 acres and excerpts from their SEC filings for 2003 that clearly show the importance financially of this donation to the viability of their business plan and profitability. Also please note all the caveats in their S-3 should this donation and other entitlements not occur.

The documents also show the totally speculative nature of St. Joe's business and the risks associated with it. On page 1 under "Company" in the S-3, they clearly state that they are a for profit real estate company involved in everything from growing pine trees to developing resorts and office parks, whatever maximizes their return on investment.

On page 2 under "Risk Factors" they show the very speculative nature of their business and their dependence on regulatory approvals and financing of infrastructure by the government. They state:

The economic growth and health of the State of Florida, particularly Northwest Florida where the majority of our land is located, are important factors in sustaining demand for our products and services. As a result, any adverse change to the economic growth and health of Florida, particularly Northwest Florida, could materially adversely affect our financial results. *The future economic growth in certain portions of Northwest Florida may be adversely*

affected if its infrastructure, such as roads, airports, medical facilities and schools, are not improved to meet increase demand. There is no assurance that these improvements will occur. (Emphasis added by me)

They further go on to state on page 3 that:

Also our ability to continue to make conservation land sales to government agencies depends on the agencies having sufficient funds available to purchase the lands.

Translated, the St. Joe Co, does not “donate” conservation lands either. It sells them to finance its other operations. In fact, conservation land sales are a profit sector for the company. Although they widely advertise and tout their conservation altruism, all of it is sold, not donated.

Unless the state and FAA have a statutorily approved joint venture public/private partnership agreement, for instance as has occurred with FDOT’s Florida Turnpike Enterprises, there is no legal reason for the government to be speculating *de facto* on what in essence is a private company’s efforts to convert their silviculture and raw land holdings into more profitable products. As of today the proposed airport property and Sector Plan area have received negligible investment by St. Joe. They are still pine trees and wetlands. The residents of the City of Panama City exist today and their requirements should be met not a private company’s profitability based on wildly speculative assumptions. The FAA has no legal right to speculate on or joint venture with private entities.

Attachments:

1. Excerpts from *Form S-3* Filing by St Joe Co, filed December 31, 2003
2. Map and enlargements of Bay County area of St. Joe holdings excerpted from *2003 St. Joe Annual Report*
3. Map 12 West Bay Area Sector Plan Overlay Map

Comment 02:

Throughout the DEIS there is a major, what one might call technical issue, with scale. The material presented for the present airport facility typically is at a scale in feet whereas the scale for the proposed site is typically in miles. This is very misleading to the public and somewhere the relative impacts between the two sites should be compared at the same scale. I will go into this in more detail in later comments.

Comment 03:

The major premise of the DEIS is that a new airport facility is needed and that the existing one is superfluous if a new facility is built, unfortunately all the supporting need documents are based on again pure speculation by a private enterprise, St. Joe. The reality is that the present inhabitants, market if you will for the new airport, are pine trees and hopes of turning those pine tree acres into industrial sites and residential and concomitant commercial development. I ask the FAA officials to actually visit the site and see what is there now...not in the St. Joe sales brochures that promise value to stockholders to the "Nth Degree." The government is charged with responsibly translating all public dollars gained through taxation to real public needs, not subsidizing private sector speculation.

Let us look at the facts nationally and then more locally to Florida to determine if there is really a need. The existing airport is what might best be called a marginal airport and has not performed anywhere near expectations. Why this lack of economic performance in the open market now justifies a totally new airport and closure of the existing one defies all business analysis.

Attached are the FAA statistics for enplanements for 2003 across the US. Panama City – Bay County International Airport (PFN) ranks somewhere near 180th on the list in enplanements and is not considered a hub. With 182,027 enplanements it ranks far below nearby Eglin AFB (VPS) that is the cutoff for what are classified as small hubs with 347,645 enplanements and somewhere near 138 in rank nationally. PFN falls well below half of the market that is presently at VPS.

Presently PFN compares with airports at:

- Aspen, Colorado (ASE)
- Melbourne, Florida (MLB)
- Augusta, Georgia (AGS)
- Evansville, Indiana (EW)
- Hyannis, Massachusetts (HYA)
- Traverse City, Michigan (TVC)
- Rochester, Minnesota (RST)
- Kalispell, Montana (FCA)
- Lincoln, Nebraska (LNK)
- Wilkes-Barre/Scranton, Pennsylvania (AVP)
- Christiansted, Virgin Islands (STX)

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- Mosinee, Wisconsin (CWA)
- Jackson Hole, Wyoming (JAC)

And it has a little more than half of all the enplanements for the state of West Virginia. Is the FAA going to support similar relocations for these airports based on totally speculative need presented by a local developer?

Looking at where PFN ranks in Florida, it is the 17th busiest of 19. PFN garnered 0.32% of all enplanements in the state. It would have to increase enplanements by 300% to even reach the enplanements at St. Petersburg-Clearwater International (PIE) that ranks 12th. St. Joe's model for development and its business model has always been the Fort Myers area and its Southwest Florida International Airport (RSW). It would have to increase enplanements by 1,600 % to reach that goal. Interestingly, when RSW was constructed Page Field was not closed but continued for general aviation use. 80% of all enplanements in Florida are handled by 4 airports. See the attached chart of Florida airports.

As PFN does not report freight to FAA, one can assume that its is of minimal consequence to the airport's operations. We are led to believe, on faith in St. Joe's predictions that they then say are risks as noted earlier, that all this will change when the pine plantations are converted to factories and businesses. As of today though, the only freight leaving the Sector Plan area is logging trucks. I do not believe the FAA is seriously considering shipping logs by air. Again, future freight needs, are pure speculation based on zero facts or contracts contingent on the placement of an airport at West Bay.

Attachments:

1. *CY 2003 Commercial Service Airports* (FAA data)
2. *CY 2003 Enplanements at US Airports, by State* (FAA data)
3. Excerpt from above for just Florida and compared to US enplanements

Comment 04:

The Sponsor in the DEIS contends that there is a need for an 8,400 foot runway to meet economic needs of the area. They give no facts for this claim other than what are called “charter flights in the future.” What are these “charter flights?”

The present main runway at PFN is 6,308 feet (14-32) in length and serves the needs of the area as it exists today and has plenty of capability left. All types of Regional Jet Aircraft (RJs) at MTOW can depart PFN as well as most aircraft in the Boeing 737 family. The 8,400-foot runway is designed to handle Airbus A320’s at MTOW going overseas or to the outer limits of their range. No such need exists nor is even contemplated except for wild speculation by St. Joe. The entire DEIS is focused on meeting this “phantom need” and all the environmental harm that would be wrought by trying to squeeze such a runway on the present PFN site versus the St. Joe West Bay donor site.

Let us review present-day airports that have less or similar runway length to PFN and see how they are doing. Several come to mind and we will use the enplanements data from Comment 3 to document their activity:

1. Chicago Midway International (MDW) with maximum runway length of 6,522 feet (13C-31C)
2. Santa Ana/John Wayne Airport (SNA) with maximum runway length of 5,700 feet (1L-19R).

FAA airport diagrams are attached.

The enplanements for these airports are 8,687,215 and 4,266,083 respectively for 2003. Following is a chart of the percentage increase in enplanements at PFN that would have to occur in order to attain the level of service at these airports:

Airport:	Airport Code:	2003 Enplanements:	Percentage Above PFN:	Maximum Runway Length:	Runway Length Difference w/ PFN:
Panama City - Bay County	PFN	182,027		6,308	
Chicago-Midway International	MDW	8,687,215	4772%	6,552	244
John Wayne Airport	SNA	4,266,083	2344%	5,700	(852)

Obviously there is a vast market gap yet to be fulfilled by PFN. A DEIS cannot completely detach itself from the economic and market realities of existing/functioning air facilities. The discrepancy between PFN and these airports is to say the least staggering, especially given the fact that the SNA main runway is 852 feet shorter than SNA’s.

Attached:

1. PFN FAA diagram

2. MDW FAA diagram
3. SNA FAA diagram.

Comment 05:

The DEIS focuses on what it terms problems with incompatible land uses abutting PFN and the merits of an airport being unrestrained. Most US airports meet none of these desires and are in fact quite the opposite. I am attaching aerials of SNA and MDW to illustrate their complete failure to meet these criteria or conditions. Like wise, I am attaching aerials of LaGuardia (LGA) and Ronald Reagan Washington National (DCA).

Obviously when one compares the development pattern around PFN, it is obvious that this issue is minor in comparison to airports that have some of the highest traffic in the country and are situated in highly urbanized areas. In fact DCA is extremely close to the White House.

Attachments:

1. Aerial of SNA
2. Aerial of PFN
3. Aerials of MDW
4. Aerial of LGA
5. Aerial of DCA

Comment 06:

The DEIS also brings into question the safety and airspace concerns associated with the existing PFN facility. Looking at air traffic for the previously cited air spaces one can see that this is a totally absurd concern. From the following air traffic reports derived from flights occurring at one of the busiest hours of daily operation for any airport, Monday from 7 to 8 AM (all data taken on January 24, 2005) one can see that PFN is not in any danger from a safety or airspace congestion standpoint. The following screen shots are from the Flight Explorer program with filters for airports applied as noted.

There are two sheets for each of the following airports:

1. Panama City
2. St. Pete/Clearwater
3. Raleigh/Durham
4. LaGuardia
5. Chicago Midway.

The first sheet shows aircraft arriving or departing from that airport only in red. The next sheet shows all aircraft in the airspace with the focus airport's traffic in red. The density of traffic handled presently by PFN obviously is rather insignificant and surely one could not contend represents a safety concern.

The DEIS is silent on how the proposed new airport is going to increase its market share based on growth in the area. Many of the vacationers to the area travel by car from a 4 to 5 hour range. St. Joe has long targeted this market. Why would they switch to flying?

Airports like Raleigh/Durham are included since it sits beside the Research Triangle Park (RTP) on about 4,000 acres. The development of RTP in the early seventies has been influenced by its proximity to the airport but the prime attraction to RTP is its close proximity to UNC, NC State and Duke University. No such institutions exist nor are planned for Bay County.

What is the economic factor that is going to drive the airport market expansion? As far as I can tell from the DEIS, it is mere speculation and propaganda developed primarily by St. Joe. Why is not a single firm located in the sector area now?

Comment 07:

The State of Florida in conjunction with the Florida Department of Transportation has developed a new policy for transportation planning and financing called the Strategic Intermodal System (SIS). The SIS identifies the major transportation nodes in Florida and the connectors between them. By concentrating on enhancing these existing facilities the state hoped to more efficiently promote the economy of the state as a whole and regions.

Panama City falls within the Northwest Region and its present airport has been designated an "Emerging SIS Airport." Emerging facilities are ones that are, so to speak, a second tier and meet certain criteria. It should be noted however that the criteria for emerging airports requires that the airport have at least .05% of national traffic. Based on the previously submitted FAA enplanement charts, PFN only has .03%. Under this newly adopted policy it does not appear that legitimate arguments could be made for expanding or relocating this airport given its present performance in compliance with the SIS.

Attachments:

1. Page 4 listing the criteria for airports as adopted January 20, 2005
2. Section on the Northwest Regions as adopted January 20, 2005
3. Overview of SIS criteria as adopted January 20, 2005

Comment 08:

In general relocating the airport runs counter to growing trends in aviation. The use of RJs is increasing tremendously as they give greater flexibility to airport markets, allow for efficient sizing of passenger requirements to smaller markets, and allows for pilots to avoid cross-training as well as allowing airlines to minimize maintenance and capital costs and fuel. PFN can easily serve all types of RJ's at full MTOW with ranges of over 1,500 nautical miles. Given the dire economic conditions of the US airline industry, increasing aircraft size and cost is not in their plans. (Wall Street Journal attached)

Southwest Airlines', the only major airline showing a profit, entire fleet is composed of 737's that have seating capacity just above RJ's. They too can be handled by PFN. So who is going to use the 8,400 foot runway that the DEIS says is required for the vitality of PFN in the future? A report on airport characteristics by Professor Odoni of MIT who advised on the Florida SIS that contains some of this material is attached as well as the *Draft Tier One Screening Analysis; Appendix B. Aircraft Runway Length Requirements* prepared for the San Diego County Regional Airport Authority by Landrum & Brown; June 23, 2003.

Finally, I am attaching a report entitled *Next Generation Air Transportation System, Integrated Plan* drafted under the leadership of Norman Mineta, the US Secretary of Transportation, that broadly explores the needs and technologies of the present and future in terms of meeting air transportation demand. This report covers everything from the effects that mini-jets/air taxis, new air traffic management control technologies, security measures and technologies, etc. that will become the basis of future air travel in the US. The proposed relocation of PFN and accompanying DEIS appears to totally disregard this US policy document that was just completed December 2004. Until the DEIS can be made consistent with the policies outlined in this study plan, I believe it to be irrelevant to national policy. It is attached for the record.

Attachments:

1. *Airport Characteristics* by Prof. Amedeo R. Odoni of MIT
2. *Draft Tier One Screening Analysis; Appendix B. Aircraft Runway Length Requirements* prepared for the San Diego County Regional Airport Authority by Landrum & Brown; June 23, 2003
3. *Big Airlines Post Weak Results, Underscoring Grim Outlook, Wall Street Journal*; January 20, 2005.
4. *Next Generation Air Transportation System, Integrated Plan*; December, 2004

Continued: Comments by Robert F. Roscow on Panama City International Airport DEIS
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Comment 09:

Given the extremely small size of John Wayne Airport, barely over 500 acres, in a service area of over 3 million people, how could anyone seriously justify expanding PFN on the numbers alone?

Attachments:

Screen shots on facts from their website at:

<http://www.ocair.com/newsandfacts/factsataglance.htm>

Comment 10:

Because the DEIS does not state the extent of proposed development, no data is given for what future storm runoff or recharge amounts would be from not just the airport property but also the development directly caused by it. I choose the word “directly” to again emphasize the totally speculative nature of this proposal. Presently the land is predominantly lowlands largely devoted to silviculture and hunting leases, economically speaking.

The proposal on the table is to develop this area into a de facto city across the bay from the present Panama City. This cannot be considered an indirect result. It is very unclear in the DEIS what the socio-economic relationship between this development proposal and Panama City is, especially given the fact that the citizens of Panama City voted to not go forward with this proposal.

Given the large distances between the proposed new infrastructure, i.e., airport, roads to airport, drainage structures, etc. it appears that accept by making the abandonment of the present PFN part of the proposal and thereby forcing the present inhabitants to seek transportation services in what is now lowlands and pine trees, there is no compelling reason to relocate for citizens other than irrational ones. Why would citizens of Panama City go out of their way to inconvenience themselves? Where is the rationalization of this irrational conclusion treated in the DEIS? Does the FAA really expect in a likewise fashion for the population served by LaGuardia to support closing it and moving it to Montauk? The DEIS asks people to accept this illogical and unrealistic proposition at face value. Give us some data that would support citizens reacting against what typically would be considered their natural inclinations.

Comment 11:

The DEIS cites standing water on PFN runways from storm events and impacts possible from Category 4 hurricanes. What airports are open during any hurricane, let alone, a Category 4? Is the relocated PFN to be open during these events? How does one get to the relocated PFN if it is open given that the roads there are all in low and flood prone areas?

If this condition were to be imposed on other major airports in the US, many would have to be closed. Is the FAA proposing to enforce this standard on all US airports? If this were the case, the first to go would be LGA and JFK. Is that really a valid concern? Tyndall AFB would also have to be closed.

Comment 12:

The road data given for the new airport does not include data for future build-out loading. Who pays for these expanded roads and what are the expected loadings?

Comment 13:

Of major concern in Chapter 4 is sound. A chart of typical sound levels is presented. Acoustic analysis requires the distance from the noise source to be given. The sound power level falls off as the square of the distance. Sound pressure levels without this reference data are meaningless.

It is also a bit unfair to compare a vacant site's sound levels with those of an existing facility. All airports in the world deal continually with noise problems and many have been highly successful in mitigating them, Toronto for example. The transformation within the aircraft industry is also addressing this problem with refinements in engine design and take-off and landing procedures.

Nowhere in the DEIS noise profiles is the subjective level discussed in terms of impacts on the bay from the West Bay site. This is a long-standing recreational asset. What will it be like with an airport that can ultimately handle the largest aircraft made on the face of the earth? Are there restrictions contemplated? If the whole point of this DEIS is to produce an airport without constraints, what are the bounding limitations on aircraft size? Have all noise abatement procedures available been tried on the existing PFN and failed and are the new ones being considered for implementation?

Again we also come back to the needs analysis. For all intents and purposes, the existing PFN is not used that much compared to other airports with its capacity that exist in the US. Why is that going to change?

Finally the noise studies look at increments of far less than 10 db. This is totally worthless information. Human beings cannot even discern a doubling of sound except if the sound pressure level increases or decreases by 10 db.

From an overall environmental standpoint, the major effect of airports on sound levels is also not from the intermittent take-offs and landings of aircraft that people psychologically are known to adjust to. It is the increase in overall ambient sound levels associated directly with the vehicular traffic feeding those airports and surrounding developed areas. The DEIS does not even address this problem.

Comment 14:

Chapter 4 also addresses the issue of compatible land uses and unsurprisingly concludes that there is less conflict between pine plantations and speculative industrial/commercial area at West Bay than the present residential areas surrounding the existing PFN. In a perfect world, everything would have its proper place but we don't live in a perfect world. We live in a continually evolving world that often juxtaposes what some might consider incompatible land uses. Be that as it may, the charge of the FAA is not to change the world but to try and efficiently as possible to mitigate those incompatibilities. The FAA is not legally empowered to be a venture capital firm that subsidizes private corporations under the guise of meeting environmental standards totally unachievable in areas already under its authority, or rephrased, diminishing, or in this case exterminating, long existent urban infrastructure to the benefit of a private corporation.

The land being “donated” after all by St. Joe would on the open market bring at best \$1,000/acre. Put a new “unconstrained” airport within 75,000 acres initially of their land holdings and the situation changes dramatically. Across the board, we are probably looking at an entitlement that nets the owner probably 1,000 to 1 on the low side, given that the lands in question were purchased over 60 years ago for next to nothing. Does the FAA really want to get into the land development finance business? Is it within the legal authority of the FAA to do so?

Comment 15:

The DEIS estimates that some 46% of the area that is wetlands will be affected, or more to the point, eradicated in the course of building the proposed West Bay Airport on the 4,000 acre “donated” site. As mitigation for this St. Joe has proposed to “donate” other lands for mitigation. State law requires that there be a net zero loss of wetlands. Given that the entire area is extremely low, criss-crossed by streams that feed the bay’s ecological systems, what areas are high are still relatively low and of small storm water retention value. Around this facility will “grow” a new city by standard Census Bureau definitions. What can one expect environmentally from all this development? In one simple answer: one hell of a lot. No matter how you want to cut it, you are looking at drastic changes to runoff, recharge, impacts on endangered species, water quality to the bay, change of use of the bay and attendant environmental changes, etc. The list could go on and on.

The whole point of an EIS is to assess the overall environmental and socio-economic impact of a project, not just isolate for convenience, certain areas. The development of a regional airport in this area will alter forever the environment of most of Bay County, on the conservative side, all the side west of the bay. The DEIS “scales” just the wetland impact at 1,400 acres and this is played against a false premise that economics dictate that PFN enlarge to meet demand and expand either into neighborhoods or sea grass or both. If there was ever a fake pass, this takes the cake. The above cited documents clearly show there is not a need for this facility at either location and that the present facility is way underutilized. Does anyone really believe that northwest Florida will go into economic collapse without this airport or that Panama City will become a blighted area without it?

To compare apples with apples I am going to show on an aerial a square comprised of 1,840 acres, the wetland only impact on the 4,000 acre airport site, so that people can really see the magnitude of what’s being proposed. Remember, these wetlands will be 100% gone and what is proposed is to substitute for them like kind on West Bay Point or convert pine tree plantation land to wetlands equal in value to achieve the zero net loss result. Remember too that on this 1,840 acres you get 53 inches on average a year. That translates to:

Continued: Comments by Robert F. Roscow on Panama City International Airport DEIS
January 27, 2005

Airport Area:	% Wetlands:	Wetland Acres:	Square Miles of Wetlands:
4,000 Acres	46%	1,840	2.875

Yearly Rainfall:
53 Inches

Water Equivalent:	Gallons:	Cubic Feet:	Acre/Inches:
	2,648,085,970	353,997,604	97,520

This is no small amount of water. What happens to it and the bay and the resources of that bay? The DEIS does not even come close to answering these issues as it confines itself to the “unbuilt city” to be.

Attachments:

1. Bay County GIS Map Aerial
2. Bay Area GIS Map of Bay County
3. Wetland Area Destroyed Superimposed on Bay GIS map

Appendix of Attachments for:

**Written Comments on the Federal Aviation Administration (FAA)
Proposed Relocation of the Panama City-Bay County International
Airport Draft Environmental Impact Statement (DEIS)**

By

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