

Glenda Wiles

From: Nina Maclean <nina.maclean@gmail.com>
Sent: Sunday, June 22, 2014 2:46 PM
To: dan@rpa-hln.com; Glenda Wiles
Subject: Ravalli County airport expansion

Dear FAA, Daniel M. Norderud, and Ravalli County Commissioners,

Richard Morrisey explains my opposition the the Ravalli County Airport so well that I will send it along to you.

"With minimal public notice and virtually no public awareness, our Commissioners are about to foist a major airport expansion on us. A revised and made to order Environmental Assessment draft has been tendered to the Commission and the public comment period expires June 30. The EA attempts to justify making the airport available to large corporate jets.

After their political philosophies and values were massively rejected by the voters in the Republican primary earlier this month, Commissioners Foss and Stoltz are about to jam one more disaster down the throats of Ravalli County citizens before they are retired. They are engineering an extension of the County airport runway to make it more available to large corporate jets. Recall that in 2011, after years of hearings and hundreds of thousands of dollars of studies, the FAA had approved a simple fix of the safety concerns at the airport at minimal to no cost to the County. But that fix did not extend the runway for large, corporate jets. Foss and Stoltz ran on platforms that, along with killing our Growth Policy and zoning, included making Ravalli County safe for large, corporate jets.

Why is this an outrage?

First, a large majority of our citizens oppose the runway extension. Recognizing this, a Republican commission in 2003 passed a resolution giving us the right to vote before any contract was let to extend the runway. That right was arbitrarily voided by our current commission in 2011. But you would think that the recent voters' rejection of Foss and Stoltz and the near spanking of Commissioner Burrows would make them pause and ponder whether their values, their agendas are consistent with

the desires of a large majority of Ravalli County citizens. If they are delusional and so believe, then why not put the issue on the November ballot? If not, they are just sticking you in the eye before they leave

Second, this extension is fraught with difficulties. The sharing ratio of costs with the FAA has changed to our disadvantage. **The FAA will now only pay for 90% of approved costs**, about \$7 million (and highly likely to increase substantially), instead of 95% as in 2011. This extension will cost more than the simple fix we had in 2011. The cost estimates in this EA are **not comparable** at all to the estimates in the previous three or four EA's. The current estimates omit many aspects of the job and underestimate the costs for those included. They are misleading. Now it is rumored that the Airport Safety Foundation, a group of six appointed and unincorporated folks, has said it will pay for the County's share of costs. Really? Who, exactly, will put up the money? And show me the money! And do you think it appropriate that a private individual buy the County's obligation and that there will be no strings? Beware of gift

Third, to comply with FAA requirements, the County is likely to have to zone property to preclude lawsuits over property value diminution from noise and pollution. Yes, zoning! Remember that Growth Policy? No Growth Policy, no zoning. Remember the 2010 ballot approving a County citizen vote before any zoning be initiated by the County. Oh, they will call the restrictions on property as an Airport Affected Area or some cutesy name, but if it walks like a duck, (Is that "backdoor zoning" Mrs. Foss?) The EA and the FAA call it zoning.

Fourth, the EA makes no mention of **County liability for diminution of property values** due to noise, pollution and zoning restrictions. When a person's property values are diminished by action of a governmental agency, the governmental agency (read: Ravalli County) is liable in damages. The FAA and other local governments throughout the country have lost millions of dollars in lawsuits on this very issue recently. So the taxpayers of Ravalli County will be liable to pay for losses in value to surrounding properties.

Fifth, to effect their agenda, the County will have to purchase a minimum of 131 acres from the

Valley's largest private landowner. The Commission is on record that it will not use eminent domain to wrest the property from this landowner. Now that alone may be sufficient to make the FAA back away, as it did for exactly that reason in the Kalisbell airport debacle. So our Commissioners will have to negotiate a purchase price. This landowner is on record all over town that he will not sell less than 600 acres and he wants **\$30,000 an acre**. The EA the Commission is about to approve assumes the property purchase price as **\$8,000 per acre** for 131 acres. Smell a disaster in the making? Smell a fox in the henhouse?

Sixth, when Commissioners Foss, Stoltz and Burrows refused to take **\$40,000** federal money for the Title X women's clinic, one of the articulated reasons they gave was that, in the time of large federal debt and deficits, they did not want to take federal monies. They are about to take nearly **\$7 million** for the airport. Title X money would have benefited about 400 impoverished women and children. This boondoggle of over **\$7, 000,000** will help less than a hundred local airplane owners. Hypocrisy anyone?

Seventh, the justification for the airport expansion is highly suspect. In order to qualify with the FAA as an airport requiring a longer runway, and more separation between runway and taxiway, than our historically adequate one, there have to be a minimum of 500 annual landings and takeoffs of larger turboprops and jets (so-called "B-II" aircraft). In fact, the airport's own records reflect that this number has decreased over the past ten years to about 390. (Everybody apparently lands on Missoula's 11,200 foot runway.) So, to make up the difference the County is relying on fueling records of aviation gas types used by those types of planes (but which is also used by other types of aircraft, including helicopters). But do you suppose that this crucial data is available to review? ICAARE has requested the fueling records numerous times. After ICAARE's lawyer wrote three times asking the County for this information, which is used in the EA in summary form as proof of larger plane airport usage, we were told that the records were sent to the FAA for its review, then sent back to the County and then tendered back to the fueling company. They are now apparently considered private records, despite

having been used to “prove” the need to expand the runway a public document and process. **Smell a lawsuit? Is this transparency in government?**

Eighth, the draft EA states that a longer runway would allow heavier loads in firefighting planes.

The fact is that, over the years, the average load of slurry in the County is seven pounds less than that taking off from Missoula. So we will spend over \$7,000,000 to get **seven more pounds per load?**

Ninth, if one reads the draft EA carefully, the increase in traffic at our airport will be in the turboprop and larger corporate jets, not in the small single engine planes now using the airport. Of course it doesn't say that directly. The EA author wouldn't want to raise any undue concerns. It just documents the national decrease in small plane aviation over the past twenty years while noting that larger corporate jet usage is on the increase. And if you build a bigger airport, the bigger planes will come. **The larger planes are much noisier than the small Cessnas and pollute more, a lot more.** The EA dismisses the pollution issue by saying that the Bitterroot Valley does not fall into some obscure FAA definition of a polluted location. Really? Never seen an inversion around here? And the noise! Imagine 6,000 more landings and takeoffs by mostly large corporate jets each year in the near future (mostly crammed into the summer months). Hamilton will be ground zero in a WWII dogfight.

Tenth, neither the local Chamber of Commerce nor the economic development authority can remember anytime in recent history when a potential new business prospect raised an issue about the length of the airport runway.

Eleventh, ICAARE agrees there are concerns at the airport. If the County can prove that our airport is a “type B-II” airport, then the runway is 40 feet too close to the taxiway; the taxiway is five feet too narrow; and a hanger was permitted to be built in 2008 (with the knowledge of the FAA) too close to the taxiway. But if the evidence is not there, these issues simply evaporate. What is true is that some of the paving out there is in poor condition. There are cheaper fixes that do not encourage large corporate jets. We had one already approved by the FAA and funded in 2011 until these Commissioners killed it

because they insisted on a longer runway. So you really have to ask, whose benefitting? Where's the money coming from? Where is the money going? And why?

Twelfth, the EA being considered by our Commission is the third or fourth since 2001 after the issue first arose in 1998. All have been inadequate just as this one is. ICAARE will document to the FAA the deficiencies in this EA. What is really needed is a full Environmental Impact Study. But that will take years and cost hundreds of thousands of dollars on top of the years and hundreds of thousands of dollars already spent on this issue. **If the runway were simply left at 4200 feet and moved slightly, there could be no more EA's, no EIS, no more delay. No need for a public vote. No noisy and polluting corporate jets. Simple.**

Doesn't an issue as long lasting and as major as expanding our general aviation airport to handle large corporate jets deserve a much longer public discussion and approval process, including a County vote in November?"

I have added the bold.

Thank you for this consideration, it only makes sense

Nina Maclean
Darby, MT