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RE: Ravalli County Proposed Airport Expansion Draft Environmental Assessment Comments

Mr. Norderud,

We respectfully submit the following comments for consideration regarding the Ravalli County Airport Draft Environmental Assessment (EA) released for public comment in May, 2014.

My family and I live in an area to the south of the current and proposed airport runways that has several hundred residences in several residential neighborhoods. We live in an area that is relatively peaceful, except for current aircraft operations. The flight path for the current and the proposed runways goes right over our home as evidenced by the aircraft regularly flying low over our home. We often can easily read the number identifications on the planes flying by. As such, we and our neighbors are impacted by any plans to alter the current airport configuration. We should have been notified and consulted during this entire process which in many aspects has been secretive and nontransparent. Is that a way to gain public support?

In November 2009 I (Greg Raymond) personally went to many of the residences in the neighborhoods to the south of the airport and spoke with 132 adults at the various homes I visited. I knocked on every door and did not pick those I was contacting, thus the results are likely a sound representation of all those who live in the area. I carried a petition with me that was subsequently presented to the Ravalli County Commissioners at a public hearing on the airport improvements. The petition stated:

“We the undersigned live in the area immediately to the south of the airport. We have considered proposals 2A and 3A. We respectfully request that the Ravalli County Commissioners adopt option 2A because this option will: 1. improve the runway thereby addressing safety concerns of airport users; 2. Keep our airport smaller and thus safer for homeowners living directly within the takeoff and landing area; and 3. save taxpayers considerable money. Additionally option 2A reduces the possibility of a larger airport with larger jets landing in the future. Moving the runway to the north as proposed in option 3A is not in our best interest and will not improve safety since this will ultimately lead to more jets and larger jets flying over our homes in the future.”

Almost everyone enthusiastically invited me into their homes to discuss this important issue. Most stated that they wanted nothing done to improve the airport (alternative 1). After discussion most everyone (91%, 120 adults) agreed that it was in the best interests of the overall community to make some improvements to the airport runway and as such they signed the petition supporting option 2A which was under consideration at that time. Only 6% (8 adults) supported airport expansion and runway lengthening. 3% (4 adults) didn't care or want to get involved. Clearly the response was overwhelming in that 91% of the contacted adults favored limiting the runway length to 4200 feet MAXIMUM now and into the future. And, the minimum amount of realignment necessary. This would maintain the current character of the airport which is acceptable to most living in the area. Option 2A had strong support of the homeowners and residents in the area. It provided a livable solution that would have improved the airport and taken care of the safety concerns of people using the airport for those types of aircraft operations occurring presently. It was a win-win, yet it was not enough for those who want to have the ability to land larger aircraft in the future. Landing larger aircraft was stated as a reason for runway lengthening several times to me by those who favor runway lengthening. Had the approved option 2A process been allowed to go forward, the new airport runway would likely have been completed by now with minimal costs and disturbance to all.

Specific comments related to the current draft EA:

1. How were the effects to property values within the airport affected area quantified? There will be significant property devaluation within the airport affected area and this needs to be quantitated with transparency regarding the methodology used for the quantitation.
2. How much lead and other pollutants such as carbon dioxide, carbon monoxide will there be due to increased aircraft traffic? The Bitterroot valley is a narrow valley that has significant air inversions that will trap exhausts from the increased aircraft activity.
3. Are there noise abatement considerations? Many aircraft make a significant amount of noise.
4. Are there vibration abatement considerations? Presently, the larger jet aircraft using the airport do shake our homes.
5. What are the data regarding impacts from increased light pollution for the new runway and airport configuration? Our area is dark at night and many of us want to keep it that way.
6. Is the Airport Affected Area truly zoning but just by another name? Zoning provisions within Ravalli County were dismissed by the current county commissioners. This is blatant hypocrisy to then accept a zoned airport affected area. Are you listening commissioners? Voters are.
7. It is not reasonable to eliminate homeowner's right for due process by removing our rights to sue for damages related to the airport functions and this will be adjudicated in court if needed.
8. The commissioners rescinded a resolution previously adopted providing the right of the citizens of Ravalli County to vote on runway lengthening. Why not put this issue to the vote of the people? That would allow an open debate of the merits and drawbacks of airport

improvements. Why has this debate been quashed? We suggest that it is because the outcome would not be what the few airport expansion proponents want. Let's shine the light on this issue so that all who so desire can participate and make a wise choice.

9. The private funding source for the EA itself is questionable and raises concerns about conflict of interest and transparency in government. Was the EA that was funded by a group that has a strong vested interest in the outcome objective and without any conflicts of interest? That seems highly unlikely in our estimation. Private funding for the EA should not have occurred.
10. Private funding for any future airport improvements also has issues regarding transparency and conflicts of interest. Improvements must be funded through government sources only to avoid these problems. The private funding source cannot be relied upon for future payments that are committed to by the county commissioners. What if the private funding source refuses to pay or is dissolved? WHO PAYS THEN? Are the commissioners listening and doing due diligence in their representation of the citizens of Ravalli County? Or are they pandering to the few who have money to fund this airport expansion. That is also a conflict of interest that the voters definitely will notice. The voters can and will speak LOUDLY.
11. The engineering firm contracted to do the EA also has issues regarding conflicts of interest. How was the private money provided to this engineering firm? Was the engineering firm provided funding to come up with a favorable EA to the preferred alternative supported by those sources funding the EA? Who exactly are the groups and individuals providing the funding? This smells bad and must be made transparent.
12. Is the same engineering company that wrote the EA going to be the engineering company that oversees the improvements to the airport? If so, this raises serious concerns regarding conflict of interest and impartiality on the part of the engineering firm contracted to formulate the EA.
13. Have the environmental impacts to Gird Creek and the Bitterroot River been adequately addressed? The proposed runway will be right in Gird Creek wetland areas and will have significant impacts. There may be endangered trout using Gird Creek for spawning – has this been analyzed?
14. How were the numbers determined for the number of aircraft using the airport determined? Living near the runway we believe that there is a strong possibility that the numbers are skewed for a couple of reasons: 1. did those doing the analysis inform the airport of the date(s) the aircraft usage data was to be gathered? If so, then local pilots supporting the airport expansion would be out doing multiple take offs and landings to push the numbers higher – this clearly is not unbiased counting; 2. a few aircraft account for the bulk of take offs and landings – touch and goes over and over will skew the numbers. How was this data obtained specifically?
15. How was the data for gasoline use obtained? Where is the description of methodology and the raw data? Why is this raw data not presented? What is the source of the data?

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16. Aircraft currently using the airport do NOT adhere to flight paths. They are not supposed to fly over my house, but they do all of the time. What has been considered regarding flight path, restrictions, and consequences for pilots who violate these zones? Has this been considered in the analysis of the affects to the well being of the homeowners and their property values?
 17. What about pilots that decide to land aircraft that shouldn't be landed at the airport. Apparently this is entirely at pilot discretion with no adverse penalty for violating restrictions. This in contrast to the restrictions and consequences placed upon those of us in residences on the ground once an airport affected area is established.

Finally, have the specific effects to the environment of the residents and families living closest to the proposed airport runway realignment and lengthening been properly analyzed and quantified? Have the specific effects to property values and aesthetics been quantified using the best methods available? Has the overall satisfaction of residents living near the airport been quantified and given due consideration? What about restrictions to be placed upon the residents living close to the airport – how do those restrictions affect the use and peaceful enjoyment of our personal property and homes. How can we preserve and protect our property values which have not really been seriously considered in the EA? How will de facto zoning, increased aircraft traffic with larger aircraft in the airport affected area affect the physical and mental well-being of residents in the area?

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Have the environmental consequences to the humans living in the area of the airport actually been given serious consideration in this environmental assessment?

Respectfully submitted,

Gregory Raymond

Lynne Raymond

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