

Dan Norderud

FAA engineer

Dear Mr. Norderud,

Thank you for the opportunity to respond to the Environmental Assessment relative to the proposed expansion of the Ravalli County Airport. The EA presents a lengthy and involved investigation of current and potential impacts of several alternatives. We will address the inadequacies of this report but want to stress that aircraft and surrounding environment safety is as much a concern of ours as anyone's.

1. The proposed action is predicated on a very cursory assessment of current airport use and anticipated future increased use. This EA admits the airport use data is contrived or estimated based on an adjustment of data from other airports where records are maintained. Therefore, there's no assurance that this key data set is accurate. Furthermore, the prediction of future use is similarly contrived being used as a key factor for the proposed action.
2. An interesting corollary to this assessment is that instead of anticipating an increase in airport traffic and therefore proposing to meet that need with airport expansion, the airport expansion will clearly result in an increase in airport traffic.
3. Relative to the subject of increase airport traffic, if there's concurrence that airport expansion will result in additional traffic, one has to look at the overall lifestyle expectation of the majority of families desiring to live in the Bitterroot Valley. This lifestyle is clearly focused on a semi rural, peaceful environment apart from the noisy, polluted, congested conditions such as found 45 miles north in Missoula. This is an intangible component that was not addressed directly but is vital to this decision.
4. The air pollution issue was inadequately addressed as the list of pollutants excluded lead. Leaded fuel is used in aircraft and potentially significant amounts of air-borne leaded components would be released. Two schools are less than 1 mile from the airport and lead is known to be extremely toxic to children.
5. The analysis of noise pollution was also inadequate and frankly, was quite 'text-book' in application without local adaptation. For example, EA products show through oversimplified modeling where the 65 db levels would be projected. It's common knowledge that a single value of any potential impact item might be below some perceived threshold, but if the number of exposures/time increases, even at below single exposure thresholds, then there is a clear impact issue. This is especially true if larger aircraft begin using the airport, as anticipated. Also, time of day was not

adequately addressed as noise at night has more impact than daytime noise. So, more runway lighting and a significantly lengthened runway more night-time airport use can be expected and therefore more noise impact.

6. It's also clear that as medium jets currently push the threshold and land at this airport, with runway lengthening, the next level of jet size with more carrying capacity as well as noise, pollution, etc, will push the new threshold.
7. Even the seemingly small amount of surface wetlands eliminated is significant as these key diverse refugia are diminishing with residential development. In addition, there is significantly more area underground beneath these surface wet areas that would be affected.
8. Light pollution was also inadequately addressed especially relative to aircraft lights during takeoff and landing. These lights shine directly into home along the flight pattern and with projected increase in air traffic this annoyance will get worse particularly with a proposed increase runway length giving pilots more confidence for night time use.

These items unmistakably indicate that this EA is significantly deficient, missing vital issues some of which pertain particularly to the Bitterroot Valley and don't fit into a standard 'text book' analysis.

As a resident of Hamilton, we are opposed to the proposed alternative for the reasons listed above. It appears this EA could be strongly challenged in court due to the deficiencies.

But I want to emphasize again that we are completely in favor of correcting the deficiency listed as aircraft safety hazards for the current aircraft designs that are using RCA.

Thank you allowing the extension for comments; this is clearly a significant issue for this valley.

Michael Harrington

Gwyn Harrington

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Glenda Wiles

From: CenturyLink Customer <m_gharrington@q.com>
Sent: Friday, July 25, 2014 2:09 PM
To: dan@rpa-hln.com
Cc: Glenda Wiles
Subject: Ravalli County Airport EA
Attachments: Environmental Assessment of the Ravalli County Airport.docx

Greetings, Attached is our response to the Environmental Assessment for the Ravalli County Airport. Thank you this opportunity; it is a key issues for the Bitterroot Valley.

Michael & Gwyn Harrington