

Grove Field Environmental Assessment Advisory Committee (EAAC) Meeting #5

March 8, 2010

Port of Camas-Washougal Conference Room

6:00 – 7:30 p.m.

Attendees:

EAAC Members: Dave Luse, Doug Anderson, Jim Ludwig, Linda S. Busch Pfeifle, Lynn Johnston and Richard Hamby

Port of Camas-Washougal (Port): David Ripp, Scot Walstra and Mary Murphy

Federal Aviation Administration (FAA): Stan Allison, Assistant Manager, Seattle Airports District Office

WHPacific, Inc: Rainse Anderson and Sarah Lucas

Corvid Consulting: Laura Jackson

Public Attendees: Six members of the public attended, see attached sign-in sheet.

Welcome and Introductions

David Ripp and Rainse Anderson opened the meeting at 6:00 pm by welcoming all EAAC members and the public to the meeting. Attendees introduced themselves and stated their association with the Grove Field Airport (Airport).

Project Update

Rainse Anderson updated the EAAC on work that has been completed on the Environmental Assessment (EA) since the last meeting in July 2009. In October 2009, an Administrative Draft EA was submitted to the Port and FAA. A revised Administrative Draft EA has been prepared as a result of Port and FAA comments. Prior to submitting a Draft EA for public comment, however, the FAA has requested we re-evaluate the method for eliminating alternatives. It may be necessary to include another build alternative within the EA along with the Port's Preferred Alternative (Alternative 7). The rationale for this is the FAA's believes the reasons for dismissing alternatives are not compelling, as none of the perceived negative impacts from other alternatives that meet the project's Purpose and Need exceed National Environmental Policy Act (NEPA) thresholds of significance.

FAA Briefing

Stan Allison began his briefing by stating his extensive experience at Grove Field as both a representative of the FAA and WSDOT-Aviation. He followed with an overview of the NEPA process and the guidance FAA must adhere to when preparing an EA. The EA is a federal document, to which the FAA is responsible for defending challenges.

The FAA's concern over the rationale for eliminating alternatives and selecting Alternative 7 as the sole alternative to be carried through the EA is that the agency could be accused of being pre-decisional. Other alternatives do meet the project's Purpose and Need without exceeding any thresholds of significance.

Mr. Allison relayed there are two ways to address this concern: 1) go back through the records to see if there are any compelling reasons for eliminating alternatives, or 2) carry a reasonable range of alternatives through the EA.

By adding additional alternatives for consideration, it does not preclude Alternative 7 from becoming the ultimate preferred alternative to be constructed. The purpose of adding in more alternatives is to clearly pick a preferred alternative that is defensible.

The consultant team then presented a review of the project alternatives that were previously identified. A copy of the PowerPoint presentation is also available on the project website.

Four alternatives that were previously dismissed from consideration (2, 3, 4 and 8) do present compelling reasons for dismissal, which were:

Alternative 2

Would reduce runway length to 1800' and does not meet the Purpose and Need

- Eliminated from evaluation, as it does not meet Purpose and Need.

Alternative 3

Meets the Purpose and Need, however, would require relocation of a residence

- As other reasonable alternatives meet the Purpose and Need, without relocating residences, this alternative was removed from evaluation.

Alternative 4

Meets the Purpose and Need, is similar to Alt 6, and requires removal of one garage

- Eliminated from evaluation, as Alt 6 also meets the Purpose and Need, but does not require removal of the garage.

**Review of
Project
Alternatives**

Alternative 8

Meets the Purpose and Need, would dead-end Delp Road

- Dead-ending Delp Road is not feasible for many safety reasons and this alternative was dismissed.

The remaining alternatives that could be considered in the EA are Alternatives 1, 5, 6 and 7. Following is a brief overview of these alternatives:

Alternative 1: No Action Alternative

This alternative does not change the existing deficiencies in runway-taxiway separation, width, length or Object Free Area (OFA) penetration. Includes pavement maintenance cost for 20-year period.

Key Features

- No property acquisition.

and approximately 0.02 acres of wetland and stream impact.

Key Features

- No penetration of the RPZ and Runway 7 approach surface.
- Runway would meet FAA design standards for RSA, RPZ, OFA and taxiway separation.
- Runway length would meet FAA recommendations.
- No wetland mitigation.
- Avoids driveway impacts.
- Right-of-way acquisition.

Cost Summary

Construction Costs	
Runway 7-25 Relocation & Extension:	\$ 2,811,801
Runway 7 RPZ Property Acquisition	\$ 74,071
Runway 25 RPZ Easement Acquisition	\$ 157,300
Runway 7-25 Other Easement Acquisitions	\$ 126,000
NE Delp Road Relocation	\$ 841,627
Right of Way and Property Acquisition	<u>\$ 116,885</u>
Subtotal	\$ 4,127,684
Contingency (25%):	<u>\$ 1,031,921</u>
Construction Cost Subtotal:	\$ 5,159,605
Engineering, Inspection and Permits (30%)	\$1,562,882
Administration, Port of Camas Washougal	\$ 25,000
Total Estimated Cost:	\$ 6,747,487

Alternative 7: Runway relocation and extension to 3,070', Delp Road in tunnel

This alternative would relocate runway to meet 150' separation standard, extend runway by 450', and widen to 60'.

Key Features

- No penetration of the RPZ and Runway 7 approach surface.
- Runway would meet FAA design standards for RSA, RPZ, OFA and taxiway separation.
- Runway length would exceed FAA recommendations.
- No environmental impacts or new stream crossing.
- No property acquisition.
- Construction would require a detour, temporary road closure or temporary roadway to direct traffic flow.

Cost Summary

Construction Costs	
Runway 7-25 Relocation & Extension:	\$ 2,761,802
Runway 7 RPZ Property Acquisition	\$ 74,071
Runway 25 RPZ Easement Acquisition	\$ 157,300
Runway 7-25 Other Easement Acquisitions	\$ 126,000
NE Delp Road Relocation	\$ 2,620,959

Right of Way and Property Acquisition	\$ <u>0</u>
Subtotal	\$ 5,740,132
Contingency (25%):	\$ <u>1,435,033</u>
Construction Cost Subtotal:	\$ 7,175,165
Engineering, Inspection and Permits (30%)	\$2,167,550
Administration, Port of Camas Washougal	\$ 25,000
Total Estimated Cost:	\$ 9,367,715

After reviewing alternatives the following table was presented to facilitate discussion with the EAAC and public attendees:

Delp Road Relocation Comparison Table				
	No Build	Alternative 5	Alternative 6	Alternative 7
Runway Length	2,620'	3,070'	3,070'	3,070'
Property Acquisition	None	0.5 ac (no structures)	0.6 ac (no structures)	None
New Stream Crossing/Wetland Impact	No	No	Yes 0.02 ac	No
Social Impact	No Change	Closer to 2 residences	Closer to 3 residences	No Change
Increase of Impervious Surface	0 ac	0.8 ac	0.5 ac	0.3 ac
Horizontal Curves	0	3	2	0
Limitation on Future Road Actions	Moderate	Moderate	Minimal	Moderate
Construction Cost	--	\$6,177,670	\$6,747,487	\$9,367,715
Maintenance Cost (20-year)	<u>\$887,500</u>	<u>\$107,670</u>	<u>\$111,140</u>	<u>\$81,950</u>
Overall Cost	\$887,500	\$6,285,340	\$6,858,627	\$9,449,665
Financial Responsibility <i>*WSDOT-Aviation only if available</i>	Port (100%) <u>\$887,500</u>	Port (2.5%) <u>\$157,134</u>	Port (2.5%) <u>\$171,466</u>	Port (2.5%) <u>\$236,242</u>
	WSDOT (0%) \$0	WSDOT (2.5%) \$157,134	WSDOT (2.5%) \$171,466	WSDOT (2.5%) \$236,242
	FAA (0%) \$0	FAA (95%) \$5,971,073	FAA (95%) \$6,515,696	FAA (95%) \$8,977,181

Discussion of Alternatives and Elimination of Alternatives

Questions from the EAAC are presented below, with responses in *italics* (as appropriate).

Is the maintenance cost for the Delp Road relocations shown, as they will be 100% locally funded?

- *Yes, the 20-year maintenance costs are shown in the table.*

Regarding Alternative 5, wasn't it removed from consideration because the County stated they would likely not approve the design because of the sharp curves?

- *Yes, while the curves meet the County's design standards, it was relayed the County would not approve the layout for that reason and because of constraints the alignment would place on future road classifications. In addition, it was dismissed due to the public perception of safety and potential accidents.*

Regarding Alternative #6, wasn't the EAAC concerned about moving Delp Road closer to homes? Locating the road closer to homes would increase noise and cause a loss of vegetation and wildlife (social impacts). Also, wasn't the public concerned that this alternative would create a hazardous "speedway?"

- *Yes, that was the reason the EAAC previously dismissed Alternative 6.*

Would Alternative 6 cause the removal of any structures?

- *No.*

One member of the EAAC stated a road project near his home, that created a straight stretch on a somewhat curvy road (like the proposed Alternative 6), did indeed create a dangerous speedway and it was his opinion the same would happen on Delp Road.

In regards to Alternative 6, the area where the stream crossing is proposed has quite a deep gully. How does the design account for this and wouldn't it have a significant cost?

- *A box culvert is proposed for this crossing and the cost associated with it has been built into the Alternative 6 cost estimate.*

Am I correct in assuming the FAA is rejecting Alternative 7 as the sole build alternative to be analyzed throughout the EA because of the cost?

- *The FAA is not rejecting Alternative 7 – or any alternatives at this point – since we aren't through the process. The other alternatives haven't been explained away adequately at this point, as the reasons for dismissal do not exceed NEPA significance thresholds. At this point, there are no significant differentiators between Alternatives 5, 6 and 7.*

We (the EAAC) focused on social impacts to make our decision of recommending Alternative 7 to become the preferred alternative. As social impacts are qualitative, it is difficult to make the compelling arguments FAA is requesting, per NEPA. So how can social impacts be compelling to the FAA?

- *It all relates back to the NEPA thresholds of significance. For example, impacting one garage is not viewed as a compelling reason to rule out an alternative.*

The FAA says the documentation is not compelling enough to eliminate alternatives. However, the EAAC was consistent in their decision making so can we explain ourselves better? We have good reasons for the decisions we made.

- *Yes, the document can further explain the EAAC's social concerns, but that will not guarantee the arguments will exceed NEPA significance thresholds.*

The EAAC did consider Alternative 5 seriously, but the County's input guided us away from it. Can we bring back Alternative 5? Social impacts (residential impacts) are a greater negative than curves in the road.

- *Yes, if the EAAC chooses, they can bring Alternative 5 or 6 (or both) back into consideration, to be evaluated throughout the whole EA.*

As stated before, the EAAC had good reasons for dismissing other alternatives and they may not want to add more than just Alternative 7.

- *If the EAAC and the Port do not include at least one other build alternative in the EA analysis, the FAA will not move forward with the project as other reasonable alternatives exist.*

As population increases, if we construct Alternative 5 now there may be a need for the County to modify the road so it more closely resembles Alternative 6, which would be a considerable expense for the local taxpayers. If the issue with Alternative 7 is cost, it would be cheaper to do the tunnel now than make future road realignments to meet new road classification standards.

Is there data of the number of residences served by Delp Road? There isn't a large need now for road widening, as residences are restricted to 5-acre lots.

- *No, that data was not collected.*

The FAA has expressed that adding additional alternatives for consideration does not preclude Alternative 7 from becoming the ultimate preferred alternative. The problem with that statement is the public won't hear that several EAAC members wanted the preferred action to be the No Action Alternative, or that Alternative 7 was too expensive. Instead, we may be stuck with Alternative 5 or 6 and some members of the EAAC do not want their name associated with those two alternatives, since they have to live in the community.

- *If during the public comment period there is an overwhelming outcry over Alternatives 5 or 6, FAA would have to consider this input. Even then, however, the FAA could still issue an equivalent environmental finding, such as a finding of no significance (FONSI), to all three build alternatives.*

The selection you are asking for tonight (to add Alternative 5 or 6 – or both – back into the EA analysis) is just process, right? What if we go through all of this and all three build alternatives receive a FONSI, can FAA go with their pick or does the Port get to choose?

- *Either we must have a clear record showing compelling reasons to dismiss alternatives or more alternatives must be added. The FAA cannot follow a process that would open them to accusations of being pre-decisional. Public comments must be then taken into consideration after issuance of the environmental finding because there may not be any significant environmental impacts distinguishing any of the alternatives. These public comments can then later be used to appeal to the FAA to select an alternative to be constructed.*

What good is our (the EAAC's) advice, if we're being told what our advice ought to be?

It is our name and it should be our advice. Carry all three build alternatives forward if you like, but not because we endorse them.

The cost estimate for Alternative 5 should be higher, due to the potential future realignment as population increases.

If we throw in Alternative 5 or 6 for process only, what happens if we are stuck with one of them?

- The FAA doesn't select projects based on cost alone. For example, Alternative 7 clearly meets the aviation needs the best (*i.e.*, as the road is completely out of the runway protection zone (RPZ)). Safety is valued the most, but we can't absolutely rule out funding Alternative 5 or 6.

One of FAA's comments from November 2009 relates to Alternative 7 needing to identify additional funding sources. Will the Liehr property acquisition be credited to the Port's 2.5% match?

- *Yes, the purchase of that property is reimbursable by the FAA, once the Airport becomes obligated.*

Why don't we just give the FAA Alternatives 5, 6 and 7? It does not sound like we have much of a choice. We went too far earlier by only selecting one preferred alternative.

We all voted for Alternative 7. By adding alternatives, we are undoing what we accomplished in a very public arena and it isn't in the EAAC's interest to add more alternatives.

How did we get this wrong and submit a draft without the all the alternatives?

- *The Port, FAA, WSDOT-Aviation and WHPacific met in August of 2009. At that time, FAA said it was appropriate to submit the administrative draft EA with just the No Action and Preferred Alternative (Alternative 7). Since then, there have been staff changes.*

We (the EAAC) followed the process the way we were told. Is it possible to just go forward with Alternative 7? For the record, we moved Alternative 7 and the No Action forward and not Alternatives 5 and 6. We are not going to change our minds.

- *If the EAAC and the Port do not include at least one other build alternative in the EA analysis, the FAA will not move forward with the project as other reasonable alternatives exist.*

If FAA is asking us (the EAAC) to select what we already rejected, can't we recommend Alternative 8?

- *It depends on what is reasonable. Alternative 8 is not reasonable.*

What was the EAAC tasked to do?

- *The NEPA process includes public input to help analyze the alternatives. The EAAC was formed to help the Port Commission in their decision-making.*

Below are questions asked by public attendees:

What would Alternative 5 do to the security of the Airport? How would you fence it?

- *Fencing for Alternative 5 would be placed east of Delp Road, to separate airport and non-airport activities. Alternative 6 would be fenced similarly. Alternative 7 would likely have fencing around the Port's property boundary.*

Impacting just a garage or a house means a lot in a small community, unlike in a large city.

- *FAA understands the rural nature of the Airport, but the significance goes back to the NEPA thresholds and FAA must abide by them.*

What do we get back from the FAA and the EA? What are the criteria?

- *Several options are possible, issuance of a: FONSI, finding of significant impacts, or FONSI with mitigation requirements, for example. The criteria are all based on NEPA guidance.*

Can you issue a FONSI on all three build alternatives, assuming we go forward with Alternatives 5, 6 and 7?

- *Yes, and there is a chance it would not change the preferred alternative.*

We are weighing the risks of adding an alternative, with a fear that Alternative 7 does not meet the requirements of a FONSI.

Is cost considered in the EA?

- *No, not to eliminate alternatives.*

**Future
meeting dates
and times**

It was decided the EA will include the No Action Alternative, along with the three build alternatives – Alternatives 5, 6 and 7.

The next meeting will be scheduled to coincide with the completion of the Draft EA public review comment period, to gather the EAAC's input.

The meeting adjourned at 8:00 pm.

Grove Field Environmental Assessment

Marci
Port of Camas-Wash
6:00 -

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Conference Room

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