
Appendix N – Past Public Comments and Responses

Appendix N

Summary of Public Comments and Airport Responses on the 2017 Ann Arbor Draft Environmental Assessment

The following is a summary of individual comments from the public regarding the 2017 Ann Arbor Draft Environmental Assessment (EA) and responses to those comments. During the 2017 EA, comments from the public were received via mail, email to City of Ann Arbor staff, comments left at the Public Hearing, as well as website comment submittals. Comments were grouped by topic and then summarized within those topics by theme or position. As such, verbatim response to comments are not provided in this appendix.

All comments received were grouped by the following topics:

- A. Noise
- B. Wildlife
- C. Air Quality
- D. Water Quality
- E. Safety
- F. Financial
- G. Technical
- H. General
- I. Support

Responses to public comments are categorized accordingly and are provided in the corresponding sections below.

A. Noise

1. *By extending the runway to 4,300 feet there is the very good possibility that this will invite larger and noisier aircraft to use the Ann Arbor Airport. The draft refuses to speculate about this or consider it as an "impact" but we think it is totally disingenuous to discount it.*

Response: The 2017 Draft EA noted that the fleet mix is not expected to significantly change in the future with the proposed length of primary runway 6/24 remaining considerably below 5,000 feet overall. The existing and future fleet mix with annual operations is presented in Appendix B as Table B-2 in the Draft EA.

A new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise and aircraft fleet mix changes that are expected. To perform this analysis, the Aviation Environmental Design Tool (AEDT) was used. The AEDT is the FAA-approved software system that dynamically models aircraft performance in space and time to produce noise estimates. AEDT is designed to estimate the long-term effects of noise using average annual input conditions. The AEDT model requires a variety of operational related inputs to model the

noise environment around an airport. Examples of these inputs include aircraft activity levels, aircraft fleet mix, runway utilization, and flight tracks.

To evaluate potential noise impacts from the proposed project, noise modeling was developed for the base year (2019) and for future years 2024 (5-year) and 2029 (10-year) for the No Action Alternative and the Preferred Alternative. Data for 2019 was used because it was the most recent calendar year in which a full 12 months of historical data was available at the time the EA was initiated.

The analysis considered potential noise impacts on noise-sensitive land uses (e.g., residential neighborhoods, recreational areas, and parks) in the project area. Potential noise impacts were measured in terms of the yearly Day-Night Sound Level (DNL) and graphically presented on a map showing the location of the 65 DNL contour that connects locations on the ground experiencing the same noise level. The FAA uses DNL as its primary noise metric. DNL accounts for the levels of aircraft events, the number of times those events take place, and the timeframe in which they occur (day or night). Noise levels greater than 65 DNL on noise sensitive areas are considered a potential impact. The FAA, USEPA, and U.S. Department of Housing and Urban Development have established the 65-decibel DNL level as the threshold for noise impacts over noise sensitive areas.

The noise analysis found that the 65 DNL contour remains completely within ARB owned property under all noise scenarios (i.e., 2019, 2024, and 2029). Noise impacts on noise sensitive land uses within the 65 DNL contour are not expected.

2. *The draft only analyzes noise for the existing traffic – not traffic that might increase in size and number.*

Response: The 2017 Draft EA included an analysis of the projected aircraft noise exposure in the areas surrounding ARB. For the analysis, forecasts of future condition aircraft operations from the FAA 2008 Terminal Area Forecast (TAF) for ARB were used. Forecasted annual operations for the year 2014 future condition totaled 69,717 operations.

In 2015, the 2009 noise analysis was reevaluated for accuracy. It was found during the 2015 reevaluation that actual aircraft operations in calendar year 2014 were significantly less than those forecast in the 2008 TAF and used in the 2009 noise analysis to model future (2014) conditions. According to the FAA Air Traffic Activity Data System (ATADS), actual aircraft operations for year 2014 at ARB were only 57,370.

Also, as stated in the response to the previous comment, the 2017 Draft EA noted that the fleet mix is not expected to significantly change in the future with the proposed length of primary runway 6/24 remaining considerably below 5,000 feet overall. The existing and future fleet mix with annual operations is presented in Appendix B as Table B-2 in the Draft EA.

A new noise analysis was be completed as part of the current 2022 EA that reexamined aircraft noise using the FAA's latest noise modeling software (AEDT). Discussion of this noise analysis was provided in the response to the previous comment.

3. *Increased noise pollution is unrespectable. Currently noise from the airport, both in intensity and frequency, is tolerable at best.*

Response: As explained above, the 2017 Draft EA included an analysis of the projected aircraft noise exposure in the areas surrounding ARB. For aviation noise analysis, the FAA has determined that the cumulative noise energy exposure of individuals to noise resulting from aviation activities must be established in terms of yearly Day-Night Sound Level (DNL). DNL is a 24-hour time-weighted-average noise metric expressed in A-weighted decibels (dBA) that accounts for the noise levels of all individual aircraft events, the number of times those events occur, and the time of day which they occur.

As part of the noise analysis conducted in 2009, the FAA's Integrated Noise Model (INM) Version 7.0a was used to develop noise exposure contours to assess the noise impacts associated with the proposed extension of Runway 6/24. The INM was the FAA's standard tool since 1978 for determining the predicted noise impact in the vicinity of airports. The noise exposure contours represent computer-generated lines connecting points of equal noise levels resulting from aircraft operations.

The INM was used to develop 65, 70, and 75 DNL noise contours for existing and future (Year 2014) conditions. For the purposes of assessing the impacts related to aircraft noise, the contour maps were evaluated with respect to the number of dwelling units and number of people located within the 65 DNL contours. As stated in the FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, "A significant noise impact would occur if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared to the no action alternative for the same timeframe."

For existing conditions at ARB, the noise analysis found that no homes or noise sensitive land uses are located within the 65 DNL contour. The existing conditions 65 DNL contour does not extend beyond airport property. In addition, no homes or noise sensitive land uses are located within the 65 DNL contour for the Preferred Alternative future conditions. This 65 DNL noise contour does not extend beyond airport property. Therefore, no people are living within areas exposed to noise levels above the 65 DNL. The Preferred Alternative is not expected to have any significant aircraft noise impacts as defined in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

A new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise using the FAA's latest noise modeling software, AEDT. Discussion of this noise analysis was provided in the response to a previous comment.

4. *The airport is already too busy and too noisy in its current capacity.*

Response: Comment noted. As explained in the response to the comment above, the 2009 noise analysis found that no homes or noise sensitive land uses are located within the 65 DNL contour for existing conditions at ARB. The existing conditions' 65 DNL contour does not extend beyond airport property. Therefore, no people are living within areas exposed to noise levels above the 65 DNL. The noise analysis conducted for the 2022 EA found that the 65 DNL

contour remains completely within ARB owned property under all scenarios (i.e., 2019, 2024, and 2029). Noise impacts on noise sensitive land uses within the 65 DNL are not expected.

5. *Airplane noise pollution has been shown in numerous medical studies to lead to learning difficulties in schoolchildren. The health consequences of this airport expansion on children needs further investigation given the close proximity of this (Kozy Heart) daycare and numerous children to the proposed expansion.*

Response: As noted in the response to a previous comment, the 2009 noise analysis found that no homes or noise sensitive land uses are located within the 65 DNL contour for existing conditions at ARB. The existing conditions' 65 DNL contour does not extend beyond airport property. In addition, no homes or noise sensitive land uses are located within the 65 DNL contour for the Preferred Alternative future conditions. This 65 DNL noise contour does not extend beyond airport property.

To further define noise impacts, a new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise using the FAA's latest noise modeling software, AEDT. Discussion of this noise analysis was provided in the response to a previous comment.

6. *I already have noise, vibration and plane lights coming into my house. At times it is annoying. Larger planes would make it unbearable to live in peace. I'm sure with the extension I would have cracked walls and not be able to sleep at night. I need quiet. I did not spend a LOT of money to live at an airport!!*

Response: As explained above, the 2009 noise analysis found that no homes or noise sensitive land uses are located within the 65 DNL contour for existing conditions at ARB. The existing conditions' 65 DNL contour does not extend beyond airport property. In addition, no homes or noise sensitive land uses are located within the 65 DNL contour for the Preferred Alternative future conditions. This 65 DNL noise contour does not extend beyond airport property. Therefore, no homes or noise sensitive land uses are exposed to noise levels above the 65 DNL for the Preferred Alternative. The Preferred Alternative is not expected to have any significant aircraft noise impacts as defined in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

Also, as previously noted, the 2017 Draft EA stated that the fleet mix is not expected to significantly change in the future with the proposed length of primary runway 6/24 remaining considerably below 5,000 feet overall. The existing and future fleet mix with annual operations is presented in Appendix B as Table B-2 in the Draft EA.

In addition, a new noise analysis was completed as part of the current 2022 EA that reexamined existing and future operations and expected changes in aircraft fleet mix. Discussion of this noise analysis was provided in the response to a previous comment.

7. *Increased noise is a concern*

Response: As explained in the response to the comment above, the 2009 noise analysis and the 2015 reevaluation found that no homes or noise sensitive land uses were located within the 65 DNL contour for existing conditions at ARB. The existing conditions' 65 DNL contour

did not extend beyond airport property. In addition, no homes or noise sensitive land uses were located within the 65 DNL contour for the Preferred Alternative future conditions. This 65 DNL noise contour does not extend beyond airport property. Therefore, no homes or noise sensitive land uses are exposed to noise levels above the 65 DNL for the Preferred Alternative. The Preferred Alternative is not expected to have any significant aircraft noise impacts as defined in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

A new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise using the FAA's latest noise modeling software, AEDT. Discussion of this noise analysis was provided in the response to a previous comment.

8. *Results of a study of the projected noise exposure have not been reported as required and I have not received a survey regarding my reaction to noise.*

Response: As required by NEPA, an assessment of the projected aircraft noise exposure in the areas surrounding ARB was provided in Section 3.1 in the 2017 Draft EA, with full details of the noise analysis provided in Appendix B.

In addition, the evaluation of the ARB noise environment and land use compatibility with airport noise was conducted using the methodologies developed by the FAA and published in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*; FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and Title 14 Code of Federal Regulations (CFR) Part 150, *Airport Noise Compatibility Planning*. As required in these publications, the FAA's Integrated Noise Model (INM) Version 7.0a was used to develop noise exposure contours to assess the noise impacts associated with the proposed extension of Runway 6/24. From 1978 to 2014, the INM had been the FAA's for determining the predicted noise impact in the vicinity of airports. The INM was replaced by the AEDT in May 2015. A new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise using AEDT. A discussion of this noise analysis was provided in the response to a previous comment.

In addition, NEPA requires public involvement activities to disclose potential impacts during an EA project. The Public Hearing held as part of the 2017 Draft EA and the Public Hearing to be held for the 2022 EA satisfies this requirement.

9. *Noise levels were tested only by simulation, only at the airport.*

Response: As explained above, the evaluation of the ARB noise environment and land use compatibility with airport noise was conducted using the methodologies developed and accepted by the FAA and published in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*; FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and Title 14 Code of Federal Regulations (CFR) Part 150, *Airport Noise Compatibility Planning*.

A new noise analysis was completed as part of the current 2022 EA that reexamined aircraft noise using the FAA's latest noise modeling software, AEDT. Discussion of this noise analysis was provided in the response to a previous comment.

10. *It is now well known that noise pollution significantly ups the risk of many serious diseases that increase mortality, including heart disease, Type 2 diabetes, and dementia.*

Response: Comment noted. As previously explained, FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, states that “A significant noise impact would occur if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared to the no action alternative for the same timeframe.”

For existing conditions at ARB, the noise analysis found that no homes or noise sensitive land uses are located within the 65 DNL contour. The existing conditions’ 65 DNL contour does not extend beyond airport property. In addition, no homes or noise sensitive land uses are located within the 65 DNL contour for the Preferred Alternative future conditions. This 65 DNL noise contour does not extend beyond airport property. Therefore, no residential areas are within areas exposed to noise levels above the 65 DNL after implementation of the Preferred Alternative. The Preferred Alternative is not expected to have any significant aircraft noise impacts as defined in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

B. Wildlife

1. *The draft asserts Canada geese have been observed in groups of 10 or less. There are hundreds of Canada geese present in the area of the farm field where the runway starts, the ponds at Stonebridge, and the golf course from April to November. Also, Canada Geese are one of the greatest risks to airplanes.*

Response: The 2017 Draft EA noted that several examples of wildlife were observed on ARB property and in the immediate surrounding areas, including robins, goldfinch, purple martins, killdeer, and a mating pair of redtail hawks. Other observations include evidence of rodent tunneling (field mice or voles) and pheasants that were heard calling. Airport staff stated that coyote and white tail deer have been observed on the airport property as well as wild turkeys. A comprehensive list of all the bird species observed by the Washtenaw Audubon Society at ARB is included in Appendix F of the 2017 Draft EA. This list includes 38 species of birds.

For the 2022 Draft EA, a Wildlife Site Visit (WSV) was conducted by the U.S. Department of Agriculture (USDA) over two days in 2019 to assess ARB for wildlife activity and provide recommendations for addressing wildlife and wildlife attractants at the Airport. During the site visit, USDA personnel observed several species including deer, Canadian geese, red-tailed hawks, and European starlings. The WSV determined that deer and the lack of a deer proof perimeter fence were concerns to Airport operations and the Airport should also consider measures to address avian hazards as well. Specific recommendations from the WSV included:

- Enclosing the airfield with a deer proof fence
- Aggressively culling deer until a wildlife fence can be installed
- Consider phasing out agricultural activity on Airport property
- Develop and implement a comprehensive Wildlife Hazard Management Plan

- Report and review any wildlife strikes
- Monitor wildlife populations and abundance on the ARB property.

The WSV concluded that the proposed action will not increase wildlife attractants or introduce new wildlife that are hazardous to aircraft operations. No wetlands, open water, or habitat will be created with the construction of the Preferred Alternative. With the proposed removal of approximately two acres of active farming near Runway 6/24 from the construction of the Preferred Alternative, it is expected that this may result in a reduction in wildlife attractants in the project area.

2. *The surrounding area has a great deal of unconstructed land and wildlife. I have concerns about the unanticipated consequences this expansion will have on local wildlife.*

Response: The 2017 Draft EA explained that implementation of the Preferred Alternative would require grading and construction of the extended and shifted runway. The areas to be impacted by grading are currently maintained and mowed for ARB or leased as agricultural land. A portion of the grading for the new taxiway near State Road would be in an area currently under restricted mowing per a voluntary verbal agreement with the Washtenaw Audubon Society. The remaining areas would continue to be maintained with limited mowing as agreed to by ARB and the Washtenaw Audubon Society. No trees would be cut or directly impacted by construction due to height obstructions.

The 2017 Draft EA concluded that the overall populations of wildlife species utilizing the area are not anticipated to be impacted as the maintenance of open grassy areas would continue. Wildlife may be temporarily impacted due to the presence of construction equipment in the vicinity.

In addition, the 2022 EA evaluated and disclosed any potential impacts to threatened and endangered species and species of special concern. The USFWS and EGLE provided information regarding 11 protected species determined to be in the vicinity of the project area. USFWS coordination determined that no critical habitat under their jurisdiction is found in the project area. Biological field investigations in 2018 and 2019 did not identify species or habitat for most of the 11 listed species. The only species having suitable habitat at ARB was the Henslow's Sparrow (which is regularly sighted at the Airport), the Indiana Bat, and the Northern Long-eared Bat (NLEB).

Since the Henslow's Sparrow is known to occur at ARB, any grading or construction near State Road would be in an area currently under "restricted mowing" per a voluntary verbal agreement with the Washtenaw Audubon Society (a chapter of Michigan Audubon) and the City of Ann Arbor. ARB revises the boundaries of this mowing agreement annually, based on Audubon's most current bird count data. To avoid potentially impacting Henslow's Sparrows during construction of the Preferred Alternative, ARB will not allow grading within agreed upon restricted mowing areas during the breeding season, which extends from early spring through mid-July. The USFWS, Michigan Department of Natural Resources, and the Washtenaw Audubon Society have concurred that the birds are reasonably protected if ARB follows these grading restrictions.

The forested area in the southwest corner of the Airport contains large stands of buckthorn with isolated aspen and box elder trees interspersed. Vegetation within this area contains a low diversity mix of grasses and forbs. Generally, this type of habitat is not conducive to supporting either the NLEB or the Indiana bat's habitat needs. Tree removals are not expected with the construction of the Preferred Alternative; however, if tree removals are deemed necessary, any cuttings will occur between October 1 – March 31 to minimize impacts to any potential bat populations.

C. Air Quality

1. *The extension of the runway will increase the emission of greenhouse gases. Though these are projected to be within NAAQS, it will still be a notable increase in greenhouse gas emissions.*

Response: Comment noted. As explained in Section 3.4 of the 2017 Draft EA, the Michigan Department of Transportation Bureau of Aeronautics (MDOT AERO) conducted an Air Quality Study of general aviation airports. Seven airports across the state were selected as case study airports, including airports similar to ARB. The results of the case study were used to draw conclusions for all general aviation airports. Key findings of the study revealed that typical general aviation airports generate a low level of air pollutants. Comparisons of existing conditions at various airports with proposed ultimate build out conditions indicate that the net change in operational air emission rates is still below standards. The report states that proposed projects at general aviation airports are not expected to cause or contribute to any new violations of the National Ambient Air Quality Standards (NAAQS).

To update and identify potential air quality impacts in the project area, a new Air Quality analysis was completed as part of the current 2022 EA project. The air quality analysis was prepared for ARB using the FAA's AEDT. Emissions were separated by construction (emissions by vehicles necessary to construct the Preferred Alternative) and operational emissions (emissions from ongoing operations once the proposed construction is completed).

Air Quality modeling found that construction emissions from the Preferred Alternative would be de minimis "of minimum impact". This qualification for de minimis means there will be no significant contamination of the air when compared to the Clean Air Act thresholds and construction emissions would not be significant nor require mitigation.

When comparing the No Action Alternative to the Preferred Alternative for operational emissions, project related emissions are expected to slightly increase due to the additional 720 feet of aircraft taxiing distance and the increase in the number of operations in the future. Per the Clean Air Act general conformity rule, the de minimis levels for an ozone marginal nonattainment area is 100 tons each of NO_x and VOC (precursors to ozone formation). The analysis determined that the project-related emissions from the Preferred Alternative would be below the Clean Air Act defined de minimis threshold, and thus the planned actions do not require a conformity determination because emissions from the Preferred Alternative are lower than the de minimis for ozone nonattainment areas.

2. *Expanding the runway and bringing in larger aircraft poses a pollution problem to our neighborhood and the farm located adjacent to the neighborhood.*

Response: As part of the 2017 Draft EA, the MDOT AERO conducted an Air Quality Study of general aviation airports. Key findings of the study revealed that typical general aviation airports generate a low level of air pollutants. Comparisons of existing conditions at various airports with proposed ultimate build out conditions indicate that the net change in operational air emission rates is still below standards. The report states that proposed projects at general aviation airports are not expected to cause or contribute to any new violations of the NAAQS.

A new air quality analysis of the project area was completed as part of the current 2022 EA project. A discussion of this air quality analysis is provided in the response to the comment above.

3. *The project creates a larger carbon footprint with more and larger aircraft traffic at the airport. Is this the direction the state wants to go? Especially when there is no safety or economic benefit.*

Response: The first part of this comment was previously addressed in responses to comments regarding noise and air quality impacts. Regarding the comment on safety and economic benefit, implementation of the Preferred Alternative would meet the proposed actions' Purpose and Need and adequately addresses the needs of the existing critical aircraft using the airport, as well as enhance the safety of airport operations by providing an unobstructed view of the entire length of Taxiway A for the Airport Traffic Control Tower. In addition, as a secondary benefit, implementation of the Preferred Alternative may have a positive impact on interstate commerce to the immediate Ann Arbor area through the removal of operational weight restrictions on critical category aircraft.

4. *The document fails to establish that the Project is exempt, presumed to conform, or its conformity status under the Clean Air Act*

Response: Appendix C in the 2017 Draft EA contains details of the air quality analysis that was conducted. The analysis concluded that a conformity determination was not required, and the proposed project is presumed to conform to the state implementation plan. A summary of the findings of the air quality analysis conducted for the 2022 EA were provided in the response to a previous comment. Details of the 2022 air quality analysis can be found in Appendix F of the 2022 EA.

D. Water Quality

1. *Water quality is a major concern as all the residents nearest the airport access their drinking water through a well system.*

Response: ARB is located in a wellhead protection area known as the Three Fires Aquifer Wellhead Protection Area. The Three Fires Aquifer supplies the City of Ann Arbor with a portion of their public drinking water supply. Three of the City's municipal wells are located at ARB. The purpose of the protection area is to prevent contamination of the aquifer. The 2017 Draft EA concluded that surface and subsurface geological conditions would not be impacted by the Preferred Alternative. Based on coordination with the City of Ann Arbor, the

proposed runway extension and shift would not impact the water supply wells or the new water supply line.

The 2022 EA also evaluated potential water quality and drinking water impacts from the proposed project. This analysis found that the proposed project is not within a sole source aquifer for drinking water. The analysis also found that there are several water wells on ARB property, all of which are outside the proposed project area. In addition, it was determined that ARB property is entirely within a wellhead protection area. Lastly, the analysis determined that the proposed action will slightly decrease groundwater infiltration within the project area due to the construction of additional impervious surfaces; however, this is not expected to tangibly impact ground water recharge rates or impact public water supply. The analysis concluded that no violations to water quality standards under the Safe Drinking Water Act are anticipated with the Preferred Alternative since no water wells are within the proposed project area.

2. *The risk to Ann Arbor's water supply which relies on wells on the Airport property because of the increased risk of fuel spills plus the potential contamination of fire-fighting foams.*

Response: The 2017 Draft EA noted in Section 3.5 that storm water discharges from ARB are currently covered under the City's National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. MI0053856 and Certificate of Coverage No. MIG610379. As part of MS4 permit compliance the City of Ann Arbor has an approved Storm Water Management Plan in place, including many pollution prevention initiatives and best management practices (BMPs) that are implemented at ARB, as applicable, and would cover additional impervious surface area resulting from the proposed project. Continued implementation of appropriate BMPs can control the rate of storm water runoff and maintain water quality standards.

3. *Concerned about the danger of possible water contamination due to runway de-icing.*

Response: This comment has been previously addressed.

4. *The land on which the expansion will take place is earmarked by the city of Ann Arbor as aquifer for city water supply.*

Response: This comment was previously addressed.

E. Safety

1. *The FAA has said that the Airport is safe or it would have been shut down. So how can the Draft argue that safety is a major purpose.*

Response: The existing Airport is considered safe according to current FAA and MDOT standards. In order to enhance safety and more effectively accommodate the critical aircraft that currently use the Airport, the City of Ann Arbor is proposing to extend and shift the existing primary runway.

The need of the proposed action is to allow the critical aircraft to safely operate at their optimum capabilities without weight restrictions (i.e., reductions in passengers, cargo, and

fuel associated with aircraft range) due to lack of suitable runway length. The proposed action will further improve operational safety by increasing line of sight for Airport Traffic Control Tower (ATCT) personnel.

As stated in the 2017 Draft EA and 2022 EA, the purpose of the proposed action is to provide facilities at ARB that fully accommodate the operational requirements of critical aircraft currently using the Airport, while at the same time enhancing safety.

2. *The draft mentions that a longer runway would provide additional space if problems in flight occur. By extending the runway, aircraft will be brought into VERY close proximity to homes, roads, and a bike path. The project altitude of aircraft over the bike path on Lohr Road is only 15 feet and over homes is only 93 feet. We cannot believe that MDOT would approve those parameters. While aeronautical regulations may allow these situations, certainly any reasonable person would consider them dangerous.*

Response: As stated in Section 3.2 of the 2017 Draft EA, the FAA and MDOT AERO have reviewed the Runway Safety Area (RSA), Object Free Area (OFA), and Runway Protection Zone (RPZ) requirements for the approach areas of Runway 6/24. Even with the implementation of the Preferred Alternative, and the shift and extension of the runway to the southwest, the RSA, OFA, and RPZ in the southwest approach area will continue to remain totally clear of obstructions and entirely on Airport property. Since the runway approach areas will continue to meet all FAA and MDOT AERO safety standards, there is no indication that the development of the Preferred Alternative will result in increased hazards to people or structures on the ground. Existing and proposed land use adjacent to and in the immediate vicinity of ARB is compatible with normal Airport operations and with that, the Preferred Alternative requires no land acquisition.

3. *The planes already fly low right above our home, we can't imagine them getting any closer.*

Response: Comment noted. The ATCT at ARB is responsible for controlling aircraft operations to ensure the safe and efficient movement of aircraft. In addition, ARB complies with all aviation safety regulations and standards of the FAA and MDOT AERO. Finally, as stated in the response to the comment above, the FAA and MDOT AERO have reviewed the RSA, OFA, and RPZ requirements for the approach areas of Runway 6/24. Even with the implementation of the Preferred Alternative, and the shift and extension of the runway to the southwest, the RSA, OFA, and RPZ in the southwest approach area will continue to remain totally clear of obstructions and entirely on Airport property. Since the runway approach areas will continue to meet all FAA and MDOT AERO safety standards, there is no indication that the development of the Preferred Alternative will result in increased hazards to people or structures on the ground. Existing and proposed land use adjacent to and in the immediate vicinity of ARB is compatible with normal Airport operations.

4. *The longer runway will attract larger and heavier aircraft to the airport. Currently planes fly directly over homes clearing the roof tops by a small distance. I am amazed that one has not already clipped treetops, and I think this is just another disaster waiting to happen which will only be increased with larger and heavier planes using the airport.*

Response: This comment was addressed in previous responses to comments.

5. *With Lohr road in the flight path it is only a matter of time until a plane has a mechanical problem and crashes onto the road or home.*

Response: This comment was addressed in previous response to comments.

6. *Note the recently reported (2017) crash of the Cessna Citation at Livingston County Airport on a 4,300-foot runway which is the length to be considered here.*

Response: Comment noted. ARB complies with all aviation safety regulations of the FAA and MDOT AERO and would continue to do so in the future should the proposed project be implemented. It should not be assumed that the specific circumstances surrounding the aircraft accident at Livingston County Airport in 2017 apply to ARB.

7. *Florida Executive Airport has had eight accidents since 2004, many with fatalities. We don't want that class of airport in Ann Arbor.*

Response: Comment noted. ARB complies with all aviation safety regulations and standards of the FAA and MDOT AERO.

8. *Expansion has NO increased safety benefits for takeoffs and landings for the existing class of aircraft that use the airport.*

Response: ARB is considered safe according to current FAA and MDOT standards. To enhance safety and more effectively accommodate the critical aircraft that currently use the Airport, the City of Ann Arbor is proposing to extend and shift the existing primary runway. The runway extension and shift would allow critical aircraft to operate safely at their optimum capabilities without weight restrictions due to lack of suitable runway length.

The proposed action focuses on extending and improving the primary runway, as it does not currently meet the FAA design objectives of the existing critical aircraft that use the airport.

As stated in Section 1.4 of the 2017 Draft EA and Section 1.5 of the 2022 EA, the purpose of the proposed action is to provide facilities at ARB that fully accommodate the operational requirements of critical aircraft currently using the Airport, while at the same time enhancing safety.

9. *In June 2009 a single engine plane had power failure and made an emergency landing on the golf course.*

Response: Comment noted. ARB complies with all aviation safety regulations and standards of the FAA and MDOT AERO and will continue to do in the future.

10. *Project is dangerous and irresponsible.*

Response: Comment noted. ARB complies with all aviation safety regulations of the FAA and MDOT AERO and would continue to do so in the future should the proposed project be implemented. As previously explained, the proposed action focuses on extending and improving the primary runway, as it does not currently meet the FAA design objectives of the existing critical aircraft that use the airport. The runway extension and shift would allow

critical aircraft to operate safely at their optimum capabilities without weight restrictions due to lack of suitable runway length. The proposed improvements would also enhance operational safety at ARB.

11. *I went over every incident and accident report filed with the FAA, and I can tell you that none of them had anything to do with runway length. A runway excursion is ALWAYS a "pilot error!"*

Response: The accelerate-stop distance is an important operating consideration for aircraft. In this concept, the pilot not only considers the amount of runway needed for takeoff, but also the amount of runway needed to abort the takeoff while on the takeoff roll and bring the aircraft to a stop. In situations where pilots detect a problem with the aircraft while on the takeoff roll, they are forced to continue the takeoff and contend with the problem in the air if there is not adequate runway remaining to bring the aircraft to a stop. By having enough remaining runway to safely abort a takeoff and stop the aircraft while still on the ground, a pilot would be able to avoid a potentially hazardous situation of taking to the air with a mechanically deficient aircraft.

A local objective of the 2017 EA proposed action is to reduce the occurrence of runway overrun incidents. While overrun incidents are not officially recognized by the FAA or MDOT AERO as justification for extending or shifting runways, there is merit to this local objective. The 11 overrun incident reports that were analyzed showed that most runway overruns at ARB involved small single-engine category A-I aircraft. These types of incidents often involve student pilots or low-time, relatively inexperienced pilots. There is no evidence in the incident reports that any of the aircraft which overran the end of the existing 3,505-foot runway exceeded the limits of the 300-foot-long turf RSA. Therefore, in each of these cases, the proposed 4,300-foot-long runway would have provided sufficient length for the small category A-I aircraft to safely come to a stop while still on the runway pavement, without running off the runway end.

The considerations mentioned above do not imply that the existing 3,505-foot runway is unsafe in any regard. Accelerate-stop distance requirements can be accommodated on the existing runway if pilots of critical category aircraft operate at reduced load capacities. In the cases of the previous runway overrun incidents, the turf RSAs to the existing runway performed as designed and provided a clear area for the overrunning aircraft to come to a stop. There were no reports of personal injuries, although there were reports of aircraft damage in several of the incidents.

It should also be noted, and has been previously explained, that the FAA and MDOT AERO have reviewed the RSA, OFA, and RPZ requirements for the approach areas of Runway 6/24. Even with the implementation of the Preferred Alternative, and the shift and extension of the runway to the southwest, the RSA, OFA, and RPZ in the southwest approach area will continue to remain totally clear of obstructions and entirely on Airport property. Since the runway approach areas will continue to meet all FAA and MDOT AERO safety standards, there is no indication that the development of the Preferred Alternative will result in increased hazards to people or structures on the ground. Existing and proposed land use adjacent to and in the immediate vicinity of ARB is compatible with normal Airport operations.

12. *The reasons for runway overruns are most often pilot error or mechanical trouble. Neither of these will be solved by extending the runway.*

Response: Extension of the runway will provide a greater margin-of-error to prevent runway overruns in the event an aircraft experiences mechanical trouble and needs increased distance to land as well as when a pilot overshoots the planned touchdown point on the runway when landing. Extension of the runway length will also increase the Accelerate Stop Distance Available in the event pilots need to abort a takeoff. As a result, the planned increased runway length reduces the potential of a runway overrun.

13. *The FAA does not consider overruns a valid reason for extending a runway.*

Response: Though discussed as a project consideration and benefit, extending the length of the runway to address potential overruns was not discussed as a reason to extend the runway in the purpose and need of 2017 EA.

However, extending the length of the runway increases the Accelerate Stop Distance Available which is a published runway dimension used by pilots to determine the length of runway available for takeoff and the remaining length of runway that would be available to stop should an aborted takeoff be needed. Increasing the length of the Accelerate Stop Distance Available helps to reduce the potential of a runway overrun as a result of an aborted takeoff.

14. *There is no mention of area residents' safety or wellbeing in the report.*

Response: This comment has been addressed in the response to the comment above.

F. Financial

1. *This would be a waste of public funds/There is no need for this use of public funds.*

Response: The benefits and the purpose and need of the proposed action have been explained in responses to previous comments.

In addition, the justification for the project was reevaluated in the current 2022 EA project. For this reevaluation, the 2022 EA referenced the findings of a report titled *Runway 6/24 Extension Justification Study* (Justification Study) that was completed in 2021. The intent of the Justification Study was to document, justify, and recommend alternatives to meet the needs of aircraft types regularly using ARB, factoring in operating weight, takeoff on a hot day, and landing on a wet runway. The Justification Study documented the types of aircraft that operate at ARB and then determined the number of current and projected operations the Airport could expect in the future. The Justification Study then developed prudent and feasible alternatives to meet the performance requirements of current and future users in accordance with methods and parameters in AC 150/5325-4B *Runway Length Requirements for Airport Design*.

The Justification Study found that the Airport Reference Code (ARC) classification of B-II small turboprop and jet aircraft types are the most demanding grouping of aircraft that currently conduct more than 500 operations per year at ARB. Thus, the Justification Study concluded

that existing and future critical aircraft for Runway 6/24 is B-II small turboprop and jet aircraft. With this understanding, a runway length that meets the needs of B-II small turboprop and jet aircraft is warranted at ARB.

- 2. The draft admits that solving the “line of sight” problem of the taxiway would be a nice side effect of a runway expansion – but it cannot be considered a primary purpose for such a large outlay of funds.*

Response: The line-of-sight concern regarding ATCT personnel’s ability to see taxiing aircraft is not the primary purpose of the proposed action, but it was identified as a need for the 2017 EA project and the 2022 EA. As explained in Section 1.4 of the 2017 EA and Section 1.5 of the 2022 EA, the purpose of the proposed action is to provide facilities at ARB that fully accommodate the operational requirements of critical aircraft currently using the Airport, while at the same time enhancing safety. The need of the proposed action was to allow the critical aircraft to safely operate at their optimum capabilities without weight restrictions (i.e., reductions in passengers, cargo, and fuel associated with aircraft range) due to lack of suitable runway length. The proposed actions would further improve operational safety by increasing line of sight for ATCT personnel.

- 3. I have done some research on the impact of airport expansion on real estate around the country and I know how changes such as the proposed extension will impact real estate values. I do not want that to happen to our community.*

Response: The Preferred Alternative minimizes impacts to the environment, resources, and surrounding area to the greatest extent possible while still complying with local, state, and federal standards and regulations. Specifically, the Preferred Alternative would not impact wetlands or streams. There would be no displacements, either residential or business, and no removal of buildings at ARB. There would be no property acquisition. According to the noise analysis that was conducted in 2009 and reevaluated in 2015, current/forecasted operations, and anticipated minimal change in fleet mix, the 65 DNL contour for the proposed runway still does not extend beyond airport property and is not within 1000 feet of any residential structure. Therefore, no residents are living within areas exposed to noise levels above the 65 DNL.

Also, as explained in the response to a previous comment, the noise analysis conducted for the 2022 EA also showed that the 65 DNL contour would not extend off airport property and noise sensitive land uses would not be impacted as a result of the proposed project.

After thorough review of present, proposed and reasonably foreseeable conditions at ARB, the environmental findings show that the Preferred Alternative will have little to no impact on the local environment. As such, it is not anticipated that the proposed action will negatively impact real estate values.

- 4. You have not established any real need for the expansion, in terms of documented economic loss supported by evidence, to current airport users.*

Response: In Section 1.5 of the 2017 Draft EA and Section 1.5 of the 2022 EA, it is explained that development of the primary runway at ARB to the recommended length of 4,300 feet

would allow most B-II small classification aircraft to operate at their optimum capabilities (without weight restrictions). Interstate commerce into and out of a community can be negatively impacted if business aircraft are forced to operate with load restrictions (i.e., reductions in passengers, cargo, and fuel associated with aircraft range) due to lack of suitable runway length.

The local impact of this is described by an ARB based corporate B-II aircraft pilot as follows: *“With the 3,500-foot runway at ARB, we are forced to reduce our departure weight with any temperature above 40 degrees Fahrenheit through a reduction in fuel, which in many cases causes us to add an additional fueling stop which could be avoided with a longer runway. On return flights to ARB, with the presence of higher winds or runway contamination, we are forced to divert to Willow Run which causes logistic issues for our passengers and business operations. In addition, many small corporate charter aircraft cannot operate from ARB based upon which Federal Aviation Regulation (FAR) they operate their aircraft under. Part 135 operators must reduce the useable length of the runway by anywhere from 20-35% based on runway conditions.”*

5. *Will the additional revenue from the airport greatly offset the lowered taxes from lowered property values?*

Response: The 2017 Draft EA and 2022 EA state that implementation of the Preferred Alternative may, as a secondary benefit, have a positive impact on interstate commerce to the immediate Ann Arbor area. Also, as previously explained, the Preferred Alternative minimizes impacts to the environment, resources, and surrounding area.

After thorough review of present, proposed and reasonably foreseeable conditions at ARB, the environmental findings show that the Preferred Alternative will have little to no impact on the local environment. As such, it is not anticipated that the proposed action will negatively impact real estate values.

6. *Will jets bring more revenue to our community?*

Response: This comment was addressed in the response to the comment above.

7. *If this proposal does not pass can the \$215,150 allocated from local budget be used to monitor aquifers at our airport or help clean up the Gillman spill?*

Response: The opportunities of reallocating funding are not under the purview of the EA.

8. *The project negatively changes the character of the entire area and reduces property values and property taxes to the state and local governments – including Ann Arbor, especially the schools.*

Response: This comment has been addressed in responses to previous comments.

9. *There is no increase in economic development. No real sustainable jobs will be created from the expansion project.*

Response: Interstate commerce into and out of a community can be negatively impacted if business aircraft are forced to operate with load restrictions (i.e., reductions in passengers,

cargo, and fuel associated with aircraft range) or forced to divert to other locations due to lack of suitable runway length. Therefore, implementation of the Preferred Alternative may, as a secondary benefit, have a positive impact on interstate commerce to the immediate Ann Arbor area.

10. *We are concerned about paying extra taxes to support an airport expansion in a residential area.*

Response: The proposed action would be funded by federal, state, and local sources. Payment of additional taxes by the community is not anticipated.

G. Technical

1. *The number of B-II operations are barely above the minimum operations which might justify an expansion.*

Response: Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13, *Airport Design*, states that runways should be long enough to accommodate the landing and departures of the design aircraft. For Runway 6/24, the most demanding aircraft conducting at least 500 annual operations were B-II types with 538 annual operations occurring in 2014 as determined by airport user surveys. Since then, the number of operations at ARB by B-II aircraft have steadily increased. A Runway 6/24 Extension Justification Study completed in 2019 found that in 2019, 679 annual operations were recorded by B-II aircraft according to the Federal Aviation Administration's (FAA) Traffic Flow Management System Counts (TFMSC) database. The runway justification study is included in the 2022 EA.

2. *The B-II aircraft can operate at full capacity when temperatures do not exceed 40 degrees, so they could operate perfectly well for about half the year. Otherwise, the vast majority of airport users are served very adequately with the existing runway.*

Response: FAA AC 150/5300-13, *Airport Design*, states that all aircraft operational considerations, including annual deviations in temperature, need to be considered when determining runway length for the aircraft intended to use the runway. When temperatures are 32 degrees Fahrenheit or colder, there is a need for additional runway length to accommodate increased braking and acceleration distances of B-II aircraft due to the often presence of packed snow and ice on the runway. Data from the 2019 Runway 6/24 Extension Justification Study found that freezing temperatures were recorded, on average, 147 days, or 40 percent of the time, each year.

The objective of the project to allow all B-II users an opportunity to utilize the airport throughout the year, not just when air temperatures are accommodating.

3. *The FAA has no intention of lowering the minimums at the Airport, so this project improving flight in low-visibility situations is a false argument.*

Response: While the FAA has no intention of lowering minimums at the Airport, the proposed shift in the Runway 24 threshold and associated 34:1 approach slope that would be implemented helps to improve flight in low-visibility situations. This is because the 34:1

approach slope is a flatter flight pattern that offers pilots increased time to make visual course corrections in low visibility situations when exiting clouds than compared to a steeper 20:1 approach slope. Steeper 20:1 approach slopes reduce the time pilots have to make course corrections when exiting clouds in low visibility situations on approach to land. Likewise, Runway 24 is required to have a 34:1 approach slope when equipped with a non-precision like the Area Navigation (RNAV) Global Positioning System (GPS) approach that is published for the runway.

4. *How many Tier 2 airports are there? How many meet every recommendation of the 7 or 8 goals that are recommended in the MASP's 2000/2008. They specifically reference Tier 1 airport and give general statements about Tier 2.*

Response: The Michigan Aviation System Plan (MASP) was updated in 2017. According to the 2017 MASP, there are 28 Tier 2 airports with only one meeting all its development goals. 27 Tier 2 airports had at least one development goal that was not met. For ARB, the length of the runway was the only development goal that was not met.

5. *How many operations were there in 2000 at the Ann Arbor Airport? Approximately 104,432. How many recently? A little over 1/2 . So 66,000 +/- airplanes. These are B-I and B-II, and C-I airplanes as written in the EA currently forecasted to operate out of this airport and other operations totaling 66,000 +/- . I did watch youtube videos of Falcon and Gulfstream (C-I I'm guessing) airplanes. They seemed to fly just fine. I didn't hear any complaints by the pilots or worries or issues. They seemed to be enjoying themselves. That's correct enjoying themselves flying out of Ann Arbor Airport on the 3505 foot runway. They chose to fly out of Ann Arbor. It is my understanding the pilots are allowed to choose where they fly out of or into. Well darn it they chose Ann Arbor.*

Response: The decision on whether to use a particular airport is entirely up to the discretion of the pilot. However, the purpose and need for the project is to provide the runway length needed to accommodate B-II aircraft types without weight concessions according to methods and criteria defined in FAA Advisory Circular (AC) 150/5325-4B, *Runway Length Requirements for Airport Design*. This accounts for many factors such as the elevation of the airfield, mean max temperature, and takeoff weight of B-II aircraft.

6. *Is there any information of how many airplanes have been FORCED to operate under weight restrictions? How many have ACTUALLY operated under weight restrictions of the 66,000 +/- annual operations? How many had to leave a person behind? How many have had less fuel and cause them to make one more additional stop to refuel from Ann Arbor? Any reports to this effect?*

Response: There is no information available on the number of aircraft operations that have needed to make weight and/or fuel concessions to operate at ARB. This is because there are no publicly available databases with this information. Likewise, there are no methods to obtain an accurate count of this number since all pilots would need to be willing to participate in an interview/survey effort to share this information.

In absence of this information, the length of runway needed was determined in accordance with FAA AC 150/5325-4B, *Runway Length Requirements for Airport Design*. Considering factors such as the critical aircraft type, elevation of the airfield, average high temperature, and takeoff weight, a length of 4,225 feet was found to be needed for the critical aircraft operating at ARB.

7. *The critical aircraft noted under 1.5 is defined as the most demanding aircraft type that performs a minimum of 500 annual operations. B-I flew about 279 and B-II flew 259 operations according to one chart. So neither flew an annual 500 operations. Therefore again no NEED.*

Response: Determination of the critical aircraft can be either a single type of aircraft or a family grouping with similar characteristics. According to airport user surveys, 538 B-II aircraft conducted operations in 2014. This could have been comprised of B-II aircraft exclusively, other aircraft categorized as Aircraft Approach Category (AAC) "B", and other aircraft categorized as Airplane Design Group (ADG) "II".

A new 2019 Runway 6/24 Extension Justification Study reviewed recent aircraft operational records and found a family grouping of Aircraft Approach Category (AAC) "B" and Airplane Design Group "II" were the most demanding critical aircraft that conducted at least 500 annual operations. This critical aircraft determination is consistent with methods defined in FAA AC 150/5000-17, *Critical Aircraft and Regular Use Determination*. The new runway justification study is included in the 2022 EA.

8. *The Airport does not need a larger runway since its operations have decreased by 45% from 2000 to 2014*

Response: Though operations have decreased, the number of annual operations by the critical aircraft has remained greater than 500. FAA AC 150/5300-13, *Airport Design*, states that runways should be long enough to accommodate the landing and departures of the most demanding design aircraft, with 500 being the threshold for federal funding participation.

An updated review of the critical aircraft and associated runway length needs was conducted as part of a 2019 Runway 6/24 Extension Justification Study. While total annual operations decreased from 2017, a family grouping of B-II aircraft types were found to continue to be the most demanding critical aircraft type that conducted at least 500 annual operations. The runway length needed for these aircraft types was determined in accordance with FAA AC 150/5325-4B, *Runway Length Requirements for Airport Design*.

9. *According to airport rules the planes should take a left turn after takeoff. None of the jets follow this pass and if they extend the runway by 900 feet, the required left turn will become meaningless and all the planes will fly above the Stonebridge community and at an even lower altitude.*

Response: Runway 6/24 has a left-hand turn traffic pattern; however, use of this traffic pattern is primarily for aircraft when landing. The direction of departing aircraft after takeoff is typically dependent upon instructions from ATCT, which may temporarily follow the routing of this traffic pattern. With an extension of the runway, the routing of the left-hand turn traffic

pattern will remain, adjusted slightly for the extension of the runway. The altitude of the traffic pattern will not be changed.

10. *ARB and MDOT incorrectly assume that extending the runway will not increase the number of air operations, the fleet mix, or other growth-inducing effects of the Project.*

Response: Section 1.5.4 Airport Operations and Forecasts of the 2017 EA notes that it is logical to conclude that operations by B-II category aircraft will also increase beyond the 538 that were documented in 2014. While this is a possibility, the purpose of the project is to enhance facilities to accommodate the operational requirements of critical aircraft currently using the airport.

Updated projections conducted as part of the 2019 Runway 6/24 Extension Justification Study show growth in aircraft operations; however, due to recent trends in aviation, this annual growth is projected at 1.29 percent (1.29%) compounded annual growth rate (CAGR). This growth rate is based on the FAA's projection of air taxi and itinerant general aviation (GA) activity across the country and can be anticipated to occur at ARB with or without a runway extension.

11. *Changing the runway approach slope is unjustified and creates additional safety issues that have not been considered.*

Response: While the runway approach slope is not changing, the shift of the threshold at the approach end of Runway 24 will allow for a 34:1 approach that is required for runways that have non-precision approaches like Runway 24. Providing a 34:1 approach slope offers pilots increased time to make visual course corrections in low visibility situations when exiting clouds than compared to a steeper 20:1 approach slope.

A change in the 34:1 runway approach slope is not proposed as a part of the purpose and need for the new 2022 EA effort. The existing runway approach slope at the approach end of Runway 6 will be shifted 720 feet to accommodate the proposed extension of the runway.

H. General

1. *We believe the only real purpose is to accommodate a very few larger aircraft at the Airport, to the detriment of the entire surrounding community.*

Response: As explained the 2017 EA, the Purpose and Need of the proposed action was to adequately address the needs of the existing critical aircraft that use the Airport, as well as enhance the safety of airport operations. In terms of aircraft types and number of operations in the future, the 2022 EA reevaluated the justification of the project including forecast of operations. As previously explained, the 2022 EA referenced the findings of a report titled *Runway 6/24 Extension Justification Study* (Justification Study) that was completed in 2021. The intent of the Justification Study was to document, justify, and recommend alternatives to meet the needs of aircraft types regularly using ARB, factoring in operating weight, takeoff on a hot day, and landing on a wet runway. The Justification Study documented the types of aircraft that operate at ARB and then determined the number of current and projected operations the Airport could expect in the future. The Justification Study then developed

prudent and feasible alternatives to meet the performance requirements of current and future users in accordance with methods and parameters in AC 150/5325-4B *Runway Length Requirements for Airport Design*.

The Justification Study found that the Airport Reference Code (ARC) classification of B-II small turboprop and jet aircraft types are the most demanding grouping of aircraft that currently conduct more than 500 operations per year at ARB. Thus, the Justification Study concluded that existing and future critical aircraft for Runway 6/24 is B-II small turboprop and jet aircraft. With this understanding, a runway length that meets the needs of B-II small turboprop and jet aircraft is warranted at ARB.

2. *We knew about the airport when we purchased property, but we do not accept a small municipal airport being turned into a commercial jetport.*

Response: As explained in the 2017 EA and 2022 EA, the Purpose and Need of the proposed action was to adequately address the needs of the existing critical aircraft that use the airport.

In Section 1.5 of the 2017 Draft EA and Section 1.5 of the 2022 EA, it is explained that development of the primary runway at ARB to the recommended length of 4,300 feet would allow most B-II small classification aircraft to operate at their optimum capabilities (without weight restrictions). Only general aviation aircraft are anticipated to use the airport.

3. *The surrounding roads are not equipped to handle any increased traffic. If the airport is expanded it is a reasonable assumption that traffic to and from the airport will increase as well, which the surrounding roads cannot accommodate.*

Response: As part of the project, coordination will be conducted with the local road commission to ensure that the local road network can accommodate any increases in traffic.

In the 2022 EA, it is stated that neither the Preferred Alternative nor the No Action Alternative are expected to increase congestion, cause degradation of level of service, or permanently close any surface roads within, or adjacent to, the project area. Traffic from construction vehicles would be managed to avoid and minimize any impacts to local roads by defining haul routes and by scheduling the arrival and departure times of construction traffic so that normal traffic patterns are not interrupted. Any potential construction impacts to surface transportation would be temporary in nature.

4. *Stop this project once and for all. No one in their right mind wants this project.*

Response: Comment noted. The need for the project has been well documented and the justification approved by the MDOT AERO and the FAA. In the 2022 EA, project justification was reexamined to ensure the project is still needed. Discussion of this reexamination in the 2022 EA has been provided in responses to previous comments above.

5. *There is an airport at Willow Run that can handle any and all jets and is only a few miles from Ann Arbor.*

Response: As described in the 2017 Draft EA and the 2022 EA, from an operational standpoint, Willow Run Airport is capable of accommodating any of the aircraft that currently fly into ARB. Although Willow Run offers longer runway lengths, and a precision Instrument Landing System (ILS) approach procedure, many corporate users still elect to fly into ARB instead of Willow Run. This demonstrates that users of the Airport value the close proximity of ARB to their corporate offices and business contacts over the larger facility at Willow Run. Use of ARB over Willow Run also provides increased economic benefits to the Ann Arbor-based businesses, as well as nearby hotels, restaurants, and area companies and industries.

Neither MDOT AERO, nor the FAA, dictate to pilots which airports they can and cannot use. The decision on whether to use a particular airport is entirely up to the discretion of the pilot.

6. *DTW is within 25 minutes and Willow Run is adjacent to Ann Arbor. There is no reason that the perceived demand for the expansion can't be satisfied by existing airports. This is a move that attempts to effectively duplicate transportation that is already in place.*

Response: See comment above.

7. *The expansion would only benefit a very small number of users.*

Response: Implementation of the Preferred Alternative would meet the needs of the existing critical aircraft using the airport, as well as enhancing the safety of airport operations. In addition, as a secondary benefit, implementation of the Preferred Alternative may have a positive impact on interstate commerce to the immediate Ann Arbor area through the removal of operational weight restrictions on critical category aircraft. The proposed runway extension will benefit all users of the Airport and is not limited to certain users or aircraft types.

8. *This runway expansion would be disastrous to Ann Arbor, the University of Michigan, Pittsfield Township, the entire state of Michigan, and all of the residents who live in very close proximity to the proposed runway expansion.*

Response: See previous comments on the benefits of the project.

9. *Comments on the difficulty of viewing the document. Locations should have had more than one copy, and the document should have been more easily accessible online/for printing.*

Response: Comment noted. The 2022 EA is available for review online at www.a2gov.org/departments/fleet-facility/Airport/Pages/AirportNewsProjects.aspx or hardcopies are available for examination during regular business hours at:

- Ann Arbor Municipal Airport, 801 Airport Drive, Ann Arbor, Michigan 48108
- Ann Arbor District Library: Downtown, 343 S. Fifth Avenue, Ann Arbor, Michigan 48104
- City Clerk's Office, Guy C. Larcom City Hall, 301 E. Huron Street, Ann Arbor, Michigan, 48104

- Pittsfield Charter Township Clerk's Office, 6201 W. Michigan Avenue, Ann Arbor, Michigan 48108

10. *There may be a desire or want for the expansion, but that does not constitute a need. The recommendations are just that, recommendations. They are not requirements.*

Response: The need for the project has been well documented and the justification approved by the MDOT AERO and the FAA. In the 2022 EA, project justification was reexamined to ensure the project is still needed. Discussion of the findings of this reexamination was provided in the response to a previous comment.

11. *The project dramatically reduces the quality of life for people in the surrounding residential areas including people in Ann Arbor.*

Response: The Preferred Alternative minimizes impacts to the environment, resources, and surrounding area to the greatest extent possible while still complying with local, state, and federal standards and regulations. Specifically, the Preferred Alternative would not impact wetlands or streams. There would be no displacements, either residential or business, and no removal of buildings at ARB. There would be no noise impacts or property acquisition.

After a thorough review of present, proposed, and reasonably foreseeable conditions at ARB, the environmental findings of the 2017 Draft EA show that the Preferred Alternative will have little to no impact on the local environment.

All required NEPA environmental resource categories were reevaluated for possible impacts as part of the 2022 EA project.

12. *Expanding the runway will bring more airport traffic to the area. Most importantly it will bring larger planes and more jet-propelled aircraft.*

Response: In Section 1.5 of the 2017 Draft EA, it is explained that development of the primary runway at ARB to the recommended length of 4,300 feet would allow most B-II small classification aircraft to operate at their optimum capabilities (without weight restrictions). Only general aviation aircraft are anticipated to use the airport.

In terms of aircraft types and number of operations in the future, the 2022 EA reevaluated the justification of the project including forecast of operations.

13. *The current campaign to lengthen the runway at the airport is a perfect example of governmental isolation from the citizens it purports to serve. Voters have received no notice of the proposed environmental assessment, have never heard it discussed, never expressed an opinion, and even the members of the City Council received no notice.*

Response: The 2017 Draft EA was made available for public review at several public locations and government offices with a follow-up public hearing held. Both activities were publicly advertised with a minimum of a 30-day notice. Local governmental officials were aware of the project since inception as funding must be approved locally before the project begins.

The 2022 EA will also be made available for public review and a public hearing will be held to afford the public an opportunity to ask questions and submit comments. Locations where the

2022 EA is available for public review has been provided in the response to a previous comment.

14. *The Airport Advisory Committee failed to establish a need for such runway.*

Response: The need for the project has been well documented and the justification approved by the MDOT AERO and the FAA. In the 2022 EA, project justification was reexamined to ensure the project is still needed. Discussion of the findings of this reexamination was provided in the response to a previous comment.

15. *The proposed airport expansion is opposed by the City of Ann Arbor, the Committee for Preserving Community Quality, and Pittsfield Township.*

Response: The comment is not applicable to the EA and is not factual. Ann Arbor City Council has supported the EA for the project on multiple occasions and the Council has not approved any motion in opposition to the proposed project.

16. *Concerned that much of the documentation, studies, and comments are 10 years old.*

Response: All required analysis and data collection required by MDOT AERO and the FAA was updated and revised in the 2022 EA project.

17. *The effects on the surrounding community could be devastating in terms of noise, disruption, and property values.*

Response: This comment has been addressed in previous comments above.

I. Support

1. *A longer runway would increase the safety for those flying in and out of the airport.*

Response: Comment noted.

2. *Studies show airports have a well-known positive economic impact on their surrounding communities – our company experiences that positive impact every day.*

Response: Comment noted.