

APPENDIX K RESPONSES TO COMMENTS

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FEMA

June 1, 2018

David B. Kessler, MA, AICP
Region Environmental Protection Specialist AWP-610-1
Federal Aviation Administration
Western Pacific Region, Office of the Airports
15000 Aviation Boulevard
Lawndale, California 90261

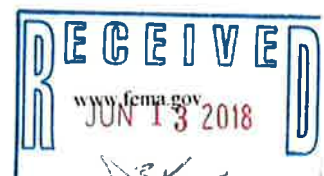
Dear Mr. Kessler:

This is in response to your request for comments regarding Notice of Availability of Draft Environmental Impact Statement and Notice of Public Workshop and Hearing Proposed Airfield Safety Enhancement Project – Tucson International Airport, Tucson, Pima County, Arizona.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Pima (Community Number 040073) and City of Tucson (Community Number 040076), Maps revised September 28, 2012. Please note that the City of Tucson, Pima County, Arizona is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65. A01

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map. A02
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any **development** must not increase base flood elevation levels. **The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways. A03



June 1, 2018

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

A04

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Tucson floodplain manager can be reached by calling Fred Felix, City Engineer, at (520) 837-0000. The Pima County floodplain manager can be reached by calling Suzanne Shields, Chief Engineer/FPA/Director at (520) 724-4600.

A05

If you have any questions or concerns, please do not hesitate to call Patricia Rippe of the Mitigation staff at (510) 627-7015.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Fred Felix, City Engineer, City of Tucson

Suzanne Shields, Chief Engineer/FPA/Director/PCRFGD, Pima County

Brian Cosson, CFM, State NFIP Coordinator, Arizona Department of Waters Resources

Patricia Rippe, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX



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JUL - 3 2018

Federal Aviation Administration
Western-Pacific Region
Airports Division - AWP-600

July 3, 2018

Mr. David B. Kessler, AICP
U.S. Department of Transportation – Federal Aviation Administration
Office of Airports – Western-Pacific Region
15000 Aviation Boulevard, AWP-610.1
Lawndale, California 90261

Subject: Tucson Airport Authority Draft Environmental Impact Statement for the Proposed Airfield Safety Enhancement Project – Review Comments

Dear Mr. Kessler:

The Regional Flood Control District (District) has reviewed the Tucson Airport Authority's Draft Proposed Airfield Safety Enhancement Project Environmental Impact Statement (EIS) for the Tucson International Airport (TIA). The District has the following comments:

1. The existing basin studies and agreements between the TIA and Pima County outline that the TAA will provide detention/retention for airport improvements once the airport development within a watershed reaches an additional 30% development. At that point, the basins will be constructed to a minimum of 50% development volumes. It is not clear from the EIS if the proposed volumes are to bring the airport up to the required 50% development stage or to the 100% development stage as outlined in the Phased Detention Agreement between the TIA, Pima County and City of Tucson (City). Please clarify. } A06
2. The 2004 Airport Wide Drainage Basin Update Report, which included 1992 studies, utilized a HEC-1 routing with the Pima County Hydrologic Methodology. The EIS utilizes the City's Tucson Stormwater Management Study (TSMS) method discharges based on the 1998 Standards Manual for Drainage Design and Floodplain Management in Tucson, Arizona (SMDDFPM). The summary table and calculations for the subwatershed and watershed designations are a bit confusing in the report; it is hard to tie the two together. The runoff values appear to be under estimated. Please clarify and validate the findings in the report.
 - a. The runoff calculations using the City's TSMS method utilizes a rainfall of 1.5 inches, the five-year, one-hour rainfall, rather than 3.0 inches, the 100-year, one-hour rainfall. The National Oceanic and Atmospheric Administration (NOAA) Atlas 14 rainfall data is presented, but it is not clear that it was utilized in the calculations. Please clarify. } A07
 - b. The basin factor selected for the flow is 0.048, but the TSMS basin factor should be 0.40 for moderately/highly urban and commercial/industrial development with dispersed flow conditions. The watershed runoff characteristics between the runways/taxiways would more accurately be described as underfit channels, i.e., small inverted crowned street or channels carrying flow, as the flow lines are designed to meet the Federal Aviation Administration's (FAA) requirement for conveying the five-year storm. The TSMS basin factor for an underfit channel is 0.032 for these land use classification. Please ensure basin factors and channel characteristics are appropriate and consistent. } A08

Suzanne Shields, P.E., Director

201 N. Stone Avenue, 9th Floor, Tucson, Arizona 85701-1207 • Phone: 520-724-4600 • Fax: 520-724-4621

Mr. David B. Kessler, AICP – U.S. Department of Transportation – Federal Aviation Administration
Tucson Airport Authority Draft Environmental Impact Statement for the Proposed Airfield Safety
Enhancement Project – Review Comments

July 3, 2018

Page 2

- c. The weighted runoff coefficients selected appear to be tied to a rainfall depth of 1.5 inches rather than 3.0 within Table 4.3 of the SMDDFPM. The tables linking soil type to drainage area and pervious/impervious area are not straightforward, so it is hard to track exactly how they were selected. Please clarify. A-9
3. Overall, the discharges presented and associated runoff volumes that would be necessary to offset the proposed improvements may be underestimated by the updated SMDDFPM method calculations. Please validate the discharges. A10
4. The February 12, 1992 letter from Parsons Brinckerhoff Engineering Services to the District states that the Hughes Wash watershed should have a 50% threshold retention volume of 5.15 acre-feet and a 100% development retention of 10.3-acre feet. The detention volume for Airport Wash based on offline detention is 23-acre feet and for Airfield Wash based on online detention is 5-acre feet. The volumes based on the phased detention are not given, only the 100% volumes. Required retention volumes for Airport and Airfield watersheds are not clearly defined. Please evaluate and clearly define volumes. A11
5. The proposed basins are upstream of our proposed location and should provide attenuation to the downstream concentration point, outletting from airport land toward the Desert Diamond Casino. Our proposed project had an approximate basin volume of 33-acre feet. The three potential basins shown in the EIS reflect a total of 31-acre feet. The EIS verifies that the locations are acceptable to the FAA given the verification constraints during design. The proposed locations would serve to attenuate local runoff from the increased imperviousness of this project, but may not have as large an impact on the watershed as a whole in comparison to our proposed basin location. Please verify impact. A12
6. An additional consideration is the report does not take into account the breakout from the Hughes Wash watershed into the El Vado Wash watershed identified in the Airport Wash South Basin Management Study. This breakout flow will not be captured at the proposed basin locations and will still increase the flow volumes at the downstream where flow exits the TAA property and negatively impact the downstream neighborhood along El Vado Wash. Please investigate and document your findings. A13

Please let me know if you would like any clarifications or additional information.

Sincerely,



Suzanne Shields, P.E.
Director and Chief Engineer

SS/tj

- c: Eric Shepp, P.E., Deputy Director – Regional Flood Control District
Andy Dinauer, P.E., Deputy Director – Regional Flood Control District
Janice Hughes, P.E., Civil Engineer – Regional Flood Control District



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 5, 2018

David B. Kessler
U.S. Department of Transportation, Federal Aviation Administration
Office of Airports – Western-Pacific Region
15000 Aviation Boulevard, AWP-610.1
Lawndale, CA 90261

Subject: Draft Environmental Impact Statement for the Proposed Airfield Safety Enhancement Project,
Tucson International Airport, Pima County, Arizona (CEQ #20180099)

Dear Mr. Kessler:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The proposed project includes the relocation of Runway 11R/29L and construction of a center parallel taxiway at the Tucson International Airport, acquisition of land for runway safety areas from Air Force Plant 44 (AFP 44) property, relocation of the earth covered magazines (ECMs) currently on AFP 44 property, and transfer of land to the U.S. Air Force on behalf of the National Guard Bureau for a munitions storage area (MSA) and access road.

EPA requests additional information and has recommendations regarding impacts to waters, air quality, noise, and greenhouse gas emissions in our enclosed comments. We have rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the attached *Summary of EPA Rating Definitions* for a description of our rating system.] A14

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at 415-947-4161; dunning.connell@epa.gov, or Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554; mulvihill.carolyn@epa.gov.] A15

Sincerely,

Carolyn Mulvihill for

Connell Dunning, Transportation Team Supervisor
Environmental Review Section

Enclosures:

EPA's Detailed Comments

Summary of EPA Rating Definitions

cc: Jesse Rice, U.S. Army Corps of Engineers

Kristin Terpening, Arizona Game and Fish Department

Jonathan Horst, Tucson Audubon Society

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED AIRFIELD SAFETY ENHANCEMENT PROJECT, TUCSON INTERNATIONAL AIRPORT, JULY 5, 2018

Waters of the U.S. and Water Quality

The draft environmental impact statement (DEIS) states that a survey to identify Waters of the United States was conducted in June 2017 and that approximately 1.1 acres of the Hughes Wash Tributary #1 and approximately 0.06 acre (about 2,600 square feet) of the Hughes Wash Tributary #2 would be impacted due to the project.

The DEIS states that this preliminary finding was submitted to the U.S. Army Corps of Engineers (USACE) for review. EPA recommends that the finding be verified by the USACE prior to publication of the final environmental impact statement (FEIS). The Federal Aviation Administration (FAA) should also coordinate with USACE to determine appropriate mitigation for impacts to waters.

Recommendations:

- The DEIS presents impacts to jurisdictional Waters of the U.S. in acres. Since the impacts are to a wash, please also present the impacts as linear feet in the FEIS. A16
- Include verification of impacts from the USACE in the FEIS. Please also include documentation of coordination with the USACE on the extent of impacts and proposed mitigation. A17
- Section 4.15.3 of the DEIS only addresses mitigation for stormwater runoff. No compensation is proposed for fill of jurisdictional waters. The FEIS should describe the existing functions of the jurisdictional waters and propose compensatory mitigation to offset unavoidable impacts from the proposed project. The Arizona Game and Fish Department and the Tucson Audubon Society operate In Lieu Fee Programs that cover the project area. Either or both of these Programs may have mitigation credits available for purchase. A18
- EPA recommends the integration of "green infrastructure" into project design where feasible for stormwater management and treatment, and identification of specific design commitments in the FEIS. A19

Air Quality

The project is located in the Tucson Air Planning Area. As stated in the DEIS, the Tucson Planning Area was redesignated to attainment for carbon monoxide (CO) on July 10, 2000 by EPA. The area now operates under a maintenance plan for CO and general conformity regulations apply. While the Tucson Air Planning Area remains a maintenance area now, it will cease to be a maintenance area after July 10, 2020. Therefore, while we appreciate the analysis of projected emissions in 2023 and 2028 that is included in the DEIS for purposes of disclosure, a general conformity analysis is only required for emissions through July 10, 2020. The 2023 and 2028 emissions comparisons are not required for general conformity. A20

EPA appreciates the commitments to minimize construction emissions that are included in the DEIS and encourages the implementation of all feasible minimization measures. A21

Recommendation:

- Commit to the minimization measures for construction emissions discussed in the DEIS, in the FEIS and Record of Decision (ROD). A22

Noise Impacts

The DEIS states that the Future (2028) Proposed Action would result in a significant impact to 74 housing units within the DNL 65 dB noise contour. Proposed mitigation includes offers of sound insulation for eligible single-family and multi-family housing units and acquisition of manufactured/mobile homes. EPA supports mitigation of all significant noise impacts to residences.

Recommendations:

- Include commitments to mitigation as described in the DEIS, including offers of sound insulation and acquisition of manufactured/mobile homes, in the FEIS and ROD.] A23
- Since noise impacts from airports continue to be a source of controversy in many communities, EPA encourages continued outreach to the impacted residents through the remainder of project planning and development, including methods such as door-to-door interviews, community meetings in community center locations, and translation services.] A24

Greenhouse Gas Emissions and Sustainability

The DEIS states that with the implementation of the Proposed Action, there would be an increase in greenhouse gas (GHG) emissions due to construction activity and due to slightly longer taxi distances for aircraft using the new south end of Runway 11R/29L. The document states that this increase would comprise an extremely minor percentage of United States based GHG emissions. However, the construction of the project would result in increased GHG emissions and there is an opportunity to identify specific commitments to reduce these emissions.

The DEIS also states that for NEPA reviews of proposed FAA actions that would result in increased emissions of GHGs, consideration should be given to whether there are areas within the scope of a project where such emissions could be reduced, and that, "GHG emissions reduction can come from measures such as changes to more fuel-efficient equipment, delay reductions, use of renewable fuels, and operational changes. TAA will continue to ensure that the Airport and its tenants are operating in an environmentally responsible and sustainable way," including incorporating energy efficiency and sustainable measures to the extent possible into the proposed action such as recycling and reusing existing pavement materials. EPA encourages these and all other efforts to minimize GHGs where practicable.

Recommendations:

- Include commitments for sustainability and GHG emissions reduction, as discussed above and in the DEIS, in the FEIS and ROD. EPA recommends including such commitments in an Airport Sustainability Plan so that measures can be tracked and implemented. Discuss any Sustainability Plans that have been developed for the airport. EPA encourages Sustainability Plans that cover both GHG emissions reduction activities and other sustainability practices such as water conservation, hazardous materials management, and wildlife habitat preservation.] A25
- Utilize as appropriate FAA resources such as lessons learned from Airport Sustainability Planning pilots (<https://www.faa.gov/airports/environmental/sustainability/>) and advisory circulars such as Advisory Circular (AC 150/5370-10F) in 2011 which includes recommendations and testing protocols for use of flyash in concrete, recycled concrete aggregate, and hot-mix asphalt for types of surfaces (https://www.faa.gov/documentlibrary/media/advisory_circular/150_5370_10F.pdf).] A26

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

1
2 U.S. DEPARTMENT OF TRANSPORTATION

3 Federal Aviation Administration

4
5 Draft Environmental Impact Statement

6 Public Hearing Remarks

7
8 Tucson International Airport

9 Tucson, Pima County, Arizona

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11
12 June 21, 2018

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15 David B. Kessler, M.A., AICP

16 Regional Environmental Protection Specialist

17
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19
20
21 Reported by:

22
23 Kimberley W. Gauthier, RPR

24 AZ Certified Court Reporter

25 Certificate No. 50767

1 MR. KESSLER: Good evening, ladies and
2 gentlemen. My name is David Kessler; I'm the Regional
3 Environmental Protection Specialist for the Airports
4 Division of The Federal Aviation Administration,
5 Western-Pacific Region. I'd like to welcome you to
6 the Public Hearing the FAA is conducting on the Draft
7 Environmental Impact Statement, or EIS, for the
8 proposed Airfield Safety Enhancement Project at Tucson
9 International Airport. I will have a short
10 presentation that I will be showing you after these
11 remarks. After the presentation, we will then take
12 public comments on the adequacy of the information in
13 the Draft EIS.

14 The notice of availability of the Draft
15 EIS was published in various local newspapers and in
16 the Federal Register on Friday, May 18, 2018, and in
17 the Federal Register on Monday, May 21, 2018. The FAA
18 is the lead federal agency responsible for the
19 preparation of the Draft EIS. The Deputy Assistant
20 Secretary of the United States Air Force for
21 Installations is acting as a cooperating agency on
22 behalf of Air Force Plant 44 and the National Guard
23 Bureau.

24 The purpose of today's hearing is to
25 collect comments from the general public concerning

1 the adequacy of the information disclosed in the Draft
2 EIS on the proposed airfield Safety Enhancement
3 Project and alternatives.

4 I would like to take this opportunity
5 to make sure that everyone understands that no
6 decision will be made today regarding the proposed
7 approval of operations specifications. Today's
8 hearing is not a question-and-answer type of forum.
9 Our job is to listen to what you have to say about the
10 adequacy of the information in the Draft EIS. In
11 other words, it's your turn to talk to us. Since we
12 are here to listen, we are not going to respond to
13 questions about the pros and cons of the proposed
14 project. Since 5:00 this afternoon, we have held a
15 public workshop for anyone to ask questions about the
16 environmental process and the various components of
17 the proposed project.

18 Following publication of the Draft EIS
19 for review and comment, the next step in the federal
20 environmental disclosure process is conducting today's
21 hearing.

22 We have a handout that provides some
23 information that you may take home with your tonight
24 with some frequently asked questions. This handout
25 also includes information on the various meetings

1 we've had on this project since we began in 2016.

2 The Draft EIS has been prepared
3 pursuant to the National Environmental Policy Act of
4 1969, or NEPA, the Council on Environmental Quality
5 Regulations, which are the implementing regulations
6 for NEPA, and the Airport and Airway Improvement Act
7 of 1982 as amended.

8 Following today's hearing and the close
9 of the comment period, we will then correct and revise
10 the EIS as necessary, based on the comments received.
11 We will also prepare a responses to the comments we
12 receive and include those responses, along with those
13 were submitted to the FAA in the Final EIS.

14 Before we begin receiving verbal
15 comments, we would like to let you know the ground
16 rules of the hearing. First, as I said earlier, we
17 are not here to respond to questions about this
18 project. We're only here to listen to your comments
19 and take notes. We also have a court reporter present
20 to ensure that we have an accurate transcript of this
21 hearing.

22 For anyone that would like to speak, we
23 ask you to fill out a speaker card like this one, and
24 give it to Chris, and then we'll call you up in the
25 order we received them. So that everyone gets an

1 opportunity to provide verbal comments, everyone will
2 get three minutes to speak. To be fair to everyone,
3 we are not going to allow people to transfer their
4 allotted time to someone else. I ask that when you
5 speak, you give us your name and address for the
6 record.

7 If there is anyone that is
8 uncomfortable speaking in front of a group, or if you
9 need more than three minutes to provide your comments,
10 we ask that you provide your comments in writing. We
11 have comment sheets, as I mentioned, like this one, in
12 the back of the room. They're available for use. You
13 can take them home, you can use them here or you can
14 drop them in the box. As I mentioned, you can also
15 mail them. I'd like you to mail them to us so that we
16 receive them no later than Monday, July the 9th. I
17 want you to understand that a verbal comment is just
18 as important as a written comment, so please feel free
19 to provide any comments on the document you may have
20 to us either verbally today or in writing.

21 As I mentioned, comments are due by
22 5:00 p.m., Pacific Daylight Time, Monday, July 9,
23 2018.

24 Lastly, I want you to know that I have
25 this hearing scheduled until 8:00 this evening. We'll

1 stay here for as long as necessary for everyone to get
2 a chance to provide verbal comments on the Draft EIS.
3 As I said earlier, our job here today is to listen to
4 your comments. At this time, I ask that everyone in
5 the room take a moment to turn off your cell phones
6 and pagers to be courteous to those people making
7 verbal comments at tonight's hearing.

8 Now what we're going to do is have a
9 short presentation. Then after the short
10 presentation, I'm going to then return it to our
11 hearing officer.

12 (The presentation was held.)

13 ROB ADAMS: Good evening. I'm Rob
14 Adams. I'm serving as the hearing officer for
15 tonight's hearing. Just as Dave mentioned, if you'd
16 like to speak, please fill out a speaker card and give
17 it to Chris, and we'll get you registered here to
18 speak. And when you do speak, if you could maybe move
19 toward the front, so that our court reporter can hear
20 you clearly and is capturing all of your comments,
21 that would be helpful.

22 So the first speaker is Barbara Harper,
23 and will be followed by Bruce Dusenberry.

24 BARBARA HARPER: Barbara Harper, in
25 Tucson, Arizona. My comments are for the language in

1 the EIS Statement. As it pertains to the taxiway and
2 the new relocated runway, I feel that they are mainly
3 designated for military, and according to Advisory
4 Circular 150/5190-6, it would be in violation if you
5 built a taxiway and runway for one aeronautical
6 activity. I would like you to have that put in as all
7 aeronautical activities. That's it. PO1

8 MR. ADAMS: Okay. Thank you.

9 Bruce Dusenberry, followed by O.K.
10 Rihl.

11 BRUCE DUSENBERRY: Do you need name and
12 address?

13 MR. ADAMS: Please.

14 BRUCE DUSENBERRY: Bruce Dusenberry,
15 7090 North Via Sierra Del Sol, Tucson, 85718. I'm a
16 pilot and have an aircraft that's hangared here at the
17 airport. I'm also a member of the Airport Authority
18 and the Board of Directors of the Tucson Airport
19 Authority.

20 All of my comments are positive and in
21 the direction of asking that you, on the basis of the
22 draft, approve the proposed project. It is
23 fundamentally a safety enhancement project, and not
24 only the hot spots on the taxiway delta and the
25 confusion between taxiway alpha and 29 right, but PO2

1 also, very importantly, the center parallel taxiway
2 construction between the new runway and the existing
3 runway that prevents the crossing of aircraft from one
4 runway to the next and incursions onto the runway.
5 This is a new safety design of taxiways that we will
6 have at our airport, and that is a huge safety
7 enhancement.

8 So there's those reasons, as well as
9 the Plant 44 munitions bunkers being removed from the
10 active area of our airport and replaced elsewhere.
11 That's good. And the work for the Guard and the
12 transfer of the land for the Air Force and the
13 National Guard are all good things in addition to the
14 safety.

15 So with that said, the last wonderful
16 thing I think about the work you've taken into account
17 is, it's taken into account all the mitigating actions
18 that need to be taken for environmental noise, and
19 primarily noise on the Pima Pineapple Cactus and the
20 water situation. So those will be mitigated, and they
21 are frankly extremely minimal. You've done a very
22 thorough job of detecting those and addressing those,
23 so there's no impediment to the project as a result of
24 the environmental concerns.

25 So with all that said, it should be

1 approved.

2 MR. ADAMS: Thank you. I appreciate
3 your comments.

4 And then our last speaker that signed
5 up is O.K.

6 O.K. RIHL: O.K. Rihl, 4160 East
7 Whittier. I've reviewed the data that's been
8 furnished. It answered any question I had. I'm a
9 strong supporter of having this done. The addition of
10 a runway, not only the safety benefits, but as a
11 businessman that travels quite a bit, in the future
12 the potential of having more flights because of more
13 safety and more capacity, I am all for. So I'm
14 speaking in favor of the project moving forward.
15 Thank you.

903

16 MR. ADAMS: Great. Thank you.

17 Okay. Is there anyone else that would
18 like to speak at this point?

19 Yes, we have one.

20 DAVE CULBERTSON: I apologize for not
21 turning my homework in.

22 MR. ADAMS: That's quite all right.
23 We'll accept it.

24 DAVE CULBERTSON: I hope I pass. My
25 name is Dave Culbertson, 10840 East Placita Metate,

1 Tucson, Arizona, 85749. I'd like to compliment you
2 and your contractor team on the outstanding work in
3 EIS that's been drafted to this point.

4 I'd like to add on to Mr. Dusenberry's
5 comments about the mitigation of the elements that are
6 within the construction area and taking into
7 consideration the impacts on -- the minor impacts on
8 the sound increase.

9 I guess I also appreciate the safety
10 improvements we're going to get here in Tucson. Being
11 a pilot myself, military, commercial and private, and
12 operating out of Tucson for a number of years, we're
13 long overdue to take care of this hot-spot issue in
14 Tucson. The only thing I would add about the EIS is
15 if you can go back and figure out a way to speed this
16 process up.

17 I think it's unacceptable that we have
18 a safety problem like we do in an airport like this.
19 We're rebounding well after the economic downturn
20 here. Our traffic is increasing. And the fact that
21 we have these safety concerns going forward are
22 unacceptable to me.

23 So whatever you can do to influence
24 congress -- I'm sure you have a lot of pull there in
25 the FAA -- I encourage you to do that. So well done,

1 and we'll look forward to getting these improvements
2 started and going on from there.

3 MR. ADAMS: Great. Thank you.

4 Any other speakers at this time?

5 (No response from the audience.)

6 MR. ADAMS: Okay. We will be here
7 until 8:00 p.m. So if you change your mind, you can
8 just come up, and we may do it in a little more
9 intimate setting if it's much later.

10 But the boards are still back there, if
11 you want to look at those. I know the FAA consultant
12 staff can still chat with you back there. But at this
13 point, we will recess until we have another speaker.

14 (A recess was taken.)

15 JANICE K. BRUNDAGE: My name is Dr.
16 Janice K. Brundage. I am a business owner in the
17 flight line at 3861 East Third Street, which is Third
18 and Alvernon. I am very much in favor of this plan.
19 I believe it's a safety issue, and I think one of the
20 primary focuses in aviation is to make sure that the
21 people are safe. It seems to me that it will provide
22 much more flexibility. This is a multi-use area,
23 between the Air Guard F-16's and the airline passenger
24 vehicles, and it extends the taxiing area so that
25 we're assured safe travels. Tucson has an airport

pos

1 that continues to strive to get busier, and if we ever
2 have those increased flights, I think it makes great
3 sense. I have no problems with the noise that may be
4 poised because I know it's a safer arrangement. Thank
5 you.] P05

6 MR. KESSLER: Is there anyone else who
7 has not had an opportunity to speak concerning the
8 information in the Draft EIS?

9 Not seeing anyone else, I will remind
10 you that if you feel you are unable to provide us with
11 verbal responses today, we will be accepting written
12 comments until 5:00 p.m. Pacific Daylight Time,
13 Monday, July 9, 2018. You can mail your comments to
14 be me at the address on the cover of the Draft EIS.

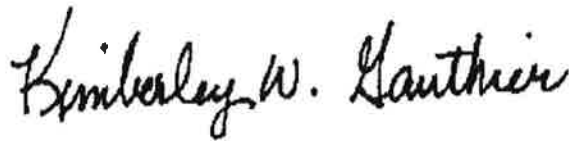
15 I want to thank everyone for their
16 comments today. The public hearing for the Draft EIS
17 for the Proposed Airfield Safety Enhancement Project
18 at Tucson International Airport is now closed.

19 (The Public Hearing was adjourned at
20 8:00 p.m.)
21
22
23
24
25

C E R T I F I C A T E

I HEREBY CERTIFY that the proceedings had upon the foregoing hearing are contained in the shorthand record made by me hereof, and that the foregoing pages constitute a full, true and correct transcript of said shorthand record, all done to the best of my skill and ability.

DATED at Tucson, Arizona this 25th day of June, 2018.



Kimberley W. Gauthier, RPR
Certified Court Reporter
Arizona Cert. No. 50767

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June 22, 2018

Barbara L. Harper, DM
7752 East Oakwood Place
Tucson, AZ 85750
blh2@mindspring.com
520 885 5590

Mr. David B. Kessler, M.A., AICP
Federal Aviation Administration
Western-Pacific Region-Airports Division, AWP-610.1
15000 Aviation Boulevard
Lawndale, CA 90261

Dear Mr. Kessler:

Thank you for the Environmental Impact Statement presentation at Tucson International Airport, June 21, 2018.

I did discuss with you a brochure that was issued last October on the support of military at the airport. Attached is that brochure. Please note that the first paragraph does not mention benefits to other aeronautical activities just the military. This assumption leads one to believe that the new project of taxiways and runways is all for the military.] POW

I read over the EIS draft and found some mistakes and irregulars:

Chapter 1

1.2.1 Description

The Tucson Airport is **owned by The City of Tucson** and leased to the Airport Authority as stated in the latest lease, copy attached.] PO7

Chapter 2 Likewise for 2.3.2.1 Ryan Airfield is **owned by the City of Tucson**]

Chapter 13

3.13.1 Socioeconomics

Although this issue is covered, there is nothing said about socio-technical systems.] PO8

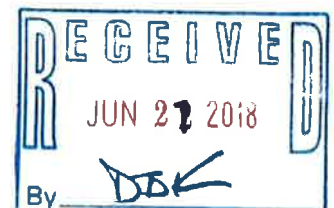
A Blast Pad is mentioned for the new runway, but am unable to locate its position at the airport.] PO9

As has been noted, the Hotspots and Runway Incursions are covered briefly in the draft. However, I would like to add that IIR/29L is still very difficult to identify from the air and most likely will continue to add to wrong runway landings. The FAAsteam has recommended that there be threshold markings and nothing has been done todate. These markings are essential to identifying the correct runway assigned by the airport ATC controller.] PO10

The lessee, Tucson Airport Authority, upon demolition of the businesses on the West side of the airfield for the new taxiway and runway, will **NOT** relocate them. This decision has a significant impact to their businesses, (Double Eagle, Velocity Air, Civil Air Patrol).] PO11

Sincerely,

Barbara Harper



Tucson Airport Authority

MILITARY SUPPORT

ON THE AIRPORT

The \$180 million Airfield Safety Enhancement project at TUS will include improvements to benefit the **Air National Guard**, including taxiways to separate aircraft for safety and efficiency, and relocate a runway that will become the Air National Guard's primary runway.

A multi-party land deal, currently in negotiation, involving TAA, the Air Force, the Federal Aviation Administration and Pima County, will provide land for a relocated munitions storage area and an access road on TAA property.

The TAA has provided the **Arizona Air National Guard**, at no cost, 12 acres for a parking lot and another seven acres for an aircraft apron around its base at TUS for more than 20 years. Additionally the TAA provides alternative access for drill weekend and construction needs.

TAA provides apron space at TUS at no charge to **Davis-Monthan Air Force Base** when its airfield is unavailable.

TUS is used to stage **Air Force** aircraft when the runways at Davis-Monthan Air Force Base are closed for short periods of time.

TAA provides maintenance support services, free of charge, to various areas used exclusively by the ANG.

TUS is a regular stopping point for itinerant aircraft from all military branches and support the air cargo requirements for Air Force plant 44.

The other military bases in the region regularly use TUS to practice their instrument approaches and touch and go's.



The TAA designs, bids and manages airfield projects done through Military Construction Cooperative Agreements (MCCAs) requested by the **Air National Guard**. Some of these projects are cost-sharing, others are solely for the Air National Guard.

The TAA is reconstructing a runway overrun entirely under its own cost. The project was originally proposed as being paid for entirely by the **Air National Guard**.

The TAA, **Air National Guard** and the Air Traffic Control Tower work closely to provide safety and emergency services, airfield access and unique use items (maintenance of Barrier Arresting Cable) used by the Air National Guard.

The TAA provides Airside Operations coordination and collaboration through regular bi-weekly meetings. The TAA also attends quarterly ANG Air Operations Board Meetings to share critical TUS operational information.

The TAA and **Air National Guard** Aircraft Rescue and Firefighting (ARFF) units train together to ensure operational readiness.

TAA provides police, security, and airport firefighting rescue response to all military events and incidents.

TCCWB

CITY OF TUCSON-CITY CLERK

PICKUP



SEQUENCE: 20151980438

NO. PAGES: 3

AAG 07/17/2015

15:14

PICK UP

AMOUNT PAID: \$7.00

AGREEMENT AMENDING LEASE

THIS AGREEMENT made this 7 day of July, 2015, by and between the CITY OF TUCSON, a municipal corporation, hereinafter called the "City," and TUCSON AIRPORT AUTHORITY, INC., a nonprofit corporation organized under the laws of the State of Arizona, hereinafter called "the Authority." City and the Authority are collectively referred to herein as "Parties."

WITNESSETH:

WHEREAS, in accordance with the provisions of A.R.S Section 28-8423 and related statutes, the City and the Authority are parties to a written lease agreement dated October 14, 1948, covering the use and operation of the premises known as Tucson International Airport, which agreement has been previously amended and extended (the "Airport Lease"); and

WHEREAS, the original term of the Airport Lease was twenty-five (25) years, with an option held by the Authority to extend the original term for an additional twenty-five (25) years to October 14, 1998, which option was exercised by the Authority on or about June 25, 1951 and to which the City consented on or about June 16, 1951;

WHEREAS, on March 15, 1971 the Airport Lease was amended and the term of the Airport Lease was extended to October 14, 2023, and the Authority was granted an option to extend the term for an additional term of twenty-five (25) years to October 14, 2048, which option was exercised on August 5, 1986; and

WHEREAS, the Parties have agreed to extend the lease term by twenty-five (25) years, through October 14, 2073; and to grant the Authority the option to extend for one (1) additional term of twenty-five (25) years, through October 14, 2098; pursuant to the terms of this Agreement.

NOW, THEREFORE, in consideration of the duties, obligations and promises of the Parties, IT IS HEREBY AGREED:

1. The term of the Airport Lease is hereby extended to October 14, 2073. The Authority may, at its sole option, to be exercised at least one (1) year prior to the expiration of the then-effective term by giving notice in writing to the City of its intention to do so, extend the term of the Airport Lease for one (1) additional term of twenty-five (25) years, through October 14, 2098.

2. Upon expiration or termination of the Airport Lease, the surrender and delivery of the demised premises, improvements, personal property and other Authority assets as well as the assignment and transfer of Authority monies, funds, and accounts to the City as provided and required under Section 2 of the Airport Lease shall occur as soon as practicable and no later than November 15 of such year.

3. The Airport Lease is hereby amended to add a new Section 13(9), as follows:

"13. OTHER CONTRACTS AND AGREEMENTS.

9. (a) Effective July 1, 2015, and continuing throughout the term of this Agreement, the Authority shall, as a condition of this Agreement, include in any and all leases, subleases, license agreements, occupancy agreements, and any other agreements executed or renewed by the Authority (if such

City Clerk File Note:

This document was signed in counterpart resulting in two signature pages. RWR:TH:dsc
7/14/15

Exhibit 1 to Resolution No. 22427
City of Tucson Contract No. 18204

renewal requires Authority consent) with any third party under which the Authority authorizes that party's use of any portion of the demised premises not already annexed into the City of Tucson, a term and condition under which that party agrees and commits to sign and execute a petition in favor of the annexation into the corporate limits of the City of the demised premises or portion thereof (hereafter, the "Annexation Clause"). The Annexation Clause shall be in substantially the following form:


"[User] agrees that if at any time during the term of this [agreement/lease/sublease/license], the City of Tucson presents [User] with an annexation petition, [User] will sign that petition in favor of annexation by the City within ten (10) days after presentation of the petition. Upon any failure to sign said petition within ten (10) days of presentation of such petition, [User] shall, to the extent permitted by law, be deemed, for purposes Title 9, Chapter 4, Article 7 of the Arizona Revised Statutes, to have signed the petition and to be included in the petition. [User] and the Authority expressly agree that the City of Tucson is an intended third party beneficiary of this [agreement/lease/sublease/license] for the purposes of the enforcement of this condition." To the extent that the Authority executes or renews any leases, subleases, license agreements, occupancy agreements or other agreement with a third party under which that third party is authorized to sublease or assign its rights to another party, such agreement shall provide that the Annexation Clause shall be binding upon the sublessee/assignee.

(b) The requirements of Section 13(9)(a) above shall not apply to temporary rights of access or similar agreements authorizing non-exclusive, non-possessionary use of any portion of the demised premises."

4. Except as herein provided to the contrary, all of the terms, provisions and conditions contained in the Airport Lease, as the same has been previously amended and supplemented, shall remain in full force and effect.

IN WITNESS WHEREOF, this Agreement has been executed the day and year above written.

CITY OF TUCSON



Mayor

July 7, 2015

TUCSON AIRPORT AUTHORITY,

By: _____

Its: _____

Date: _____

Attest:



City Clerk

July 7, 2015

Approved As To Form:



City Attorney



July 5, 2018

CITY OF
TUCSON

CITY
MANAGER'S
OFFICE

Mr. David B. Kessler, AICP
United States Department of Transportation
Federal Aviation Administration
Office of Airports Division – Western – Pacific Region
15000 Aviation Boulevard, AWP-610.1
Lawndale, California 90261

Mr. Kessler:

The City of Tucson supports the Proposed Airfield Safety Enhancement Project for the Tucson International Airport, in Tucson, Pima County, Arizona.

The City will work with all partners to ensure the transfer of "Parcel H", from the Tucson Airport Authority to Raytheon, will move forward as quickly as possible. This will help facilitate the timely completion of this project overall.

P12

If you have any questions, please feel free to contact me at 520-837-4058.

Sincerely,

Mike Czechowski
Project Manager
Economic Initiatives

Cc: Michael J. Ortega P.E., City Manager, City of Tucson
Chuck H. Huckelberry, County Administrator, Pima County
Paul Kramkowski, Manager Facility Operations, Raytheon Missile Systems
Bonnie Allin, President and CEO, Tucson Airport Authority

July 6, 2018

VIA FEDERAL EXPRESS PRIORITY

Mr. David B. Kessler, AICP
U.S. Department of Transportation
Federal Aviation Administration
Office of Airports – Western-Pacific Region
15000 Aviation Boulevard, AWP-610.1
Lawndale, California 90261

**Re: Tucson Airport Authority Comments on the Proposed Airfield Safety
Enhancement Project Draft Environmental Impact Statement
Tucson International Airport, Tucson, Arizona**

Dear Mr. Kessler:

A Notice of Availability published in the Federal Register on May 21, 2018 indicated the above referenced Draft Environmental Impact Statement (EIS) will be available for public review and comment until Monday, July 9, 2018. In accordance with the Notice of Availability, the Tucson Airport Authority (TAA) is hereby providing comments on the Draft EIS (see attached Table 1).

TAA strongly supports the proposed Airfield Safety Enhancement (ASE) Project and looks forward to working with the Federal Aviation Administration and other stakeholders in accordance with the upcoming Record of Decision.

Sincerely,



Eric M. Roudebush
Director of Environmental Services

Table 1. TAA Comments on the Draft EIS

Comment #	Page Number	Section	Comment
1	4-128	4.12.3	<p>TAA has reviewed our noise mitigation records and offer the following revisions to the text on page 4-128:</p> <p>Of the 78 housing units in the significant increase area of the Future (2028) Proposed Action noise contour, eight single-family units and three multifamily units have been previously sound insulated. This leaves 67 dwelling units that are to be mitigated in the following manner. In order to be eligible for sound insulation the interior noise levels must be at DNL 45 dB or above. For the purposes of mitigating the significant noise increases, the following actions would occur:</p> <ul style="list-style-type: none"> • Offer to sound insulate 27 single-family housing units • Offer to sound insulate four two-family housing units • Offer to sound insulate 17 multi-family housing units • Offer 19 manufactured/mobile housing units acquisition. Since mobile homes cannot be effectively sound insulated because of the nature of the home to be able to be moved from place to place, the owners of the 19 mobile homes within the area of 1.5 dB increase within the DNL 65 dB noise contour for the Future (2028) Proposed Action would be given an offer for acquisition and residents would be offered relocation assistance per the Uniform Relocation Assistance and Real Property Acquisition Act. TAA has effectively relocated other mobile home parks in the past under 14 C.F.R. Part 150. <p>Please globally revise the EIS based on this information (including, but not limited to, the exhibits, tables, and text noted in Comments #2 through #8).</p>
2	Exhibit 4-19	4.12.3	Update Exhibit 4-19 per the information in Comment #1
3	4-120	4.12.2.4	Update Tables 4-40 and 4-41 per the information in Comment #1
4	S-8	Summary	Update Table S-1 per the information in Comments #1
5	4-110	4.12.2.2	Update Table 4-37 and 4-38 per the information in Comment #1
6	4-89	4.12.1.4	Update Table 4-32 per the information in Comment #1
7	4-79	4.12.1.2	Update Table 4-28 per the information in Comment #1
8	4-156	4.13.3	Update text to be consistent with Comment #1
9	Global Comment	Various	The Lesser Long-nosed Bat is no longer a Federally listed species under the Endangered Species Act. Please revise the EIS accordingly (including references to the suspension of night grading activities as a mitigation measure).
10	4-28	4.5.2.1	Middle of first paragraph: Replace reference to shovel-nosed snake with rufous-winged sparrow.
11	4-28	4.5.2.1	Last paragraph: Insert line space before Western Red Bat header.
12	Appendix H, page 6	2.1	Add El Vado Wash to Figure 3 between the Airport Property Boundary and the General Study Area Boundary

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Comment #	Page Number	Section	Comment	
13	Appendix H	Table 3.3 and 4.3a	In Drainage Area 2, change the outfall location to: Nogales Hwy to Valencia Wash.	P25
14	Appendix H	Table 3.3 and 4.3a	In Drainage Area 3, change the outfall location to: Nogales Hwy to El Vado Wash.	P26
15	Appendix H, Page 10	4.2	The second sentence in the first paragraph of Section 4.2 indicates the Proposed Action improvements are entirely located within the Airfield Wash watershed. This is incorrect. The Proposed Action improvements are located within the Airfield Wash and Hughes Wash watersheds (see Comment #16 for additional details). Please revise the EIS globally, as necessary, to incorporate this comment.	P27
16	Appendix H, Page 11	4.3	The first sentence in the first paragraph of Section 4.3 indicates Airfield Wash watershed is made up of 6 sub-basins. This is incorrect. Three sub-basins make up Airfield Wash watershed (sub-basins 2, 3, and 4). Sub-basins 5 and 6 drain to Hughes Wash and therefore, are part of the Hughes Wash watershed. Sub-basin 1 drains to Airport Wash and therefore, is part of the Airport Wash watershed.	P28
17	Appendix H	Exhibits 1 through 6	The outfall from sub-basin 3 is shown connecting to Santa Clara Wash. This is incorrect. The outfall from sub-basin 3 drains to El Vado Wash (which also needs to be shown in [added to] these Exhibits).	P29
18	Appendix H, Page 16	6.0	Add the report <i>Airport Wide Drainage Update Final Report</i> , prepared by Stantec Consulting, 2004 to the References. This report is referenced in Section 3.0 on page 8 of Appendix H.	P30
19	Appendix H, Page 6	2.1	Change the last sentence in paragraph located above Figure 3 to: Hughes Wash conveys flow from subbasins 5 and 6 (see Exhibit 5 in Appendix C) and flow from AFP 44 and ultimately discharges west of Nogales Highway south of Hermans Road.	P31
20	Appendix H, Page 7	2.1	Top of page 7, second line: Replace Hermans Road with Aero Park Blvd.	P32
21	Appendix H, Page 9	3.3	Change Section 3.3 header to: Airfield Wash, Airport Wash, and Hughes Wash Hydrology	P33
22	Appendix H, Page 9	3.3	Change the first sentence of the first paragraph to: There are three distinct stormwater outfalls from the Airfield Wash watershed, two distinct stormwater outfalls from the Hughes Wash watershed, and one distinct stormwater outfall from the Airport Wash watershed (see Exhibit 5 in Appendix C).	P34
23	Appendix H, Page 9	3.3	Change the third sentence of the first paragraph to: These six subbasins of Airfield Wash, Airport Wash, and Hughes Wash watersheds are analyzed to determine the peak discharges reaching each outfall.	P35
24	Appendix H, Page 9	3.3	Change the header of Table 3.3 to: Airfield Wash, Airport Wash, and Hughes Wash Watersheds Existing Conditions Subbasin Discharge	P36
25	Appendix H, Page 11	4.3	Change the header of Table 4.3a to: Airfield Wash, Airport Wash, and Hughes Wash Watersheds Proposed Conditions	P37

Comment #	Page Number	Section	Comment
			Subbasin Discharge
26	Global Comment	Various	EIS Exhibits showing the General Study Area Boundary incorrectly label the eastern boundary as S. Swan Road. The eastern boundary of the General Study Area does not coincide with a road. For reference purposes, consider labeling S. Swan Road and S. Wilmot Road (located west and east, respectively, of the General Study Area eastern boundary).

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COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317
(520) 724-8661 FAX (520) 724-8171

C.H. HUCKELBERRY
County Administrator

July 05, 2018

David B. Kessler, M.A., AICP
Regional Environmental Protection Specialist
Office of Airports, AWP-610.1
Federal Aviation Administration, Western-Pacific Region
15000 Aviation Boulevard
Lawndale, CA 90261



Re: **Comments on the May 2018 Draft Environmental Impact Statement Proposed Airfield
Safety Enhancement Project at Tucson International Airport**

Dear Mr. Kessler:

This letter serves as Pima County's review and comments on the proposed Draft Environmental Impact Statement (EIS) for airfield safety improvements and a second runway at Tucson International Airport (TIA).

Pima County supports the proposed improvements as outlined in the Draft EIS. We find the analysis and Impact Statement to be thorough and well documented.

As you know, the County has had a significant interest in assuring our region's largest private employer, Raytheon, has the ability to continue their operations uninterrupted. We want to ensure Raytheon has the opportunity to expand operations. The exchange of Parcel F transferred to the Tucson Airport Authority (TAA) and Parcel G to the US Air Force (USAF), along with the development of an equivalent explosive storage capacity for Raytheon due to the displacement of 12 USAF earth covered magazines. These actions will ensure continued operations for Raytheon.

To expand Raytheon Operations, Parcel H will need to be acquired by the City of Tucson and/or Pima County from the Tucson Airport Authority with the approval of the Federal Aviation Administration and transferred to the USAF or Raytheon or the National Guard Bureau as funding sources are available. We believe this transfer is now possible due to the presently drafted National Defense Authorization Act Section 2821 clearly authorizes the transfer and conveyance of Parcels F and G, as well as the substitute or new explosive storage facilities, but is silent regarding Parcel H and the Arizona Air National Guard munitions storage area.

Mr. David B. Kessler

Re: **Comments on the May 2018 Draft Environmental Impact Statement Proposed Airfield Safety Enhancement Project at Tucson International Airport**

July 5, 2018

Page 2

The Draft EIS addresses Parcel H and the Arizona Air National Guard munitions storage area in several places listed below:

"TAA would make available a parcel of land identified as Parcel "H" to the USAF for AFP 44 as needed." (Page 1-31) (emphasis added)

"The existing MSA at the Tucson Air National Guard Base does not meet the USAF separation distances required for explosive operations and exposes non-munitions personnel to explosive hazards." (Page 1-32)

"Conveyance of Parcel "H" (up to 290 acres) from TAA to be made available to USAF as needed." (Page 1-40) (emphasis added)

"The eastern 55-acre portion of Parcel "H" has been proposed for construction of a Munitions Storage Area, to include ECMs, and access road, for the AANG at the Tucson Air National Guard Base located adjacent to TUS." (Page 1-40)

"Approval of the ultimate transfer of Parcel "H" from TAA to the USAF, a portion of which would be designated for use by the NGB." (Page 1-47) (emphasis added)

Clarification should be made as to the language regarding "TAA would make available a parcel of land identified as Parcel "H" to the USAF for AFP 44 as needed." During our numerous meetings, in preparation of the Draft EIS, I was under the impression that Parcel H could be acquired now through the appropriate disposal process and the Air Force may not accept the property until it is needed. If this sentence is taken literally, one could assume the property will be retained by TAA until the Air Force states it is needed. As planned, this parcel, less the property needed by the AANG of approximately 55 acres will be acquired using City of Tucson funds obtained from the Raytheon Annexation Fund. This transaction needs to proceed as soon as practically possible to assure Raytheon that they have the option of expanding their operations in Tucson. This simply means the acquisition of the property needs to occur now, not "as needed" by the USAF or Raytheon.

As discussed in our June 21, 2018 meeting, I indicated the County would, if necessary, acquire the 55-acres needed for the AANG; however, other options for reserving this property for AANG use could be advanced. Absent any other acquisition and/or reservation arrangement, the County will acquire this property on behalf of the AANG and the National Guard Bureau for their proposed munitions storage area. If the County acquires this 55 acres we are fine with designating it for use by the NGB.

Finally, the sale and disposal of all of Parcel H should commence as soon as practically possible. I understand TAA has obtained an appraisal for Parcel H. Our review of this appraisal indicates its valuation is flawed due to inappropriate comparable sales. These

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Mr. David B. Kessler

Re: **Comments on the May 2018 Draft Environmental Impact Statement Proposed Airfield
Safety Enhancement Project at Tucson International Airport**

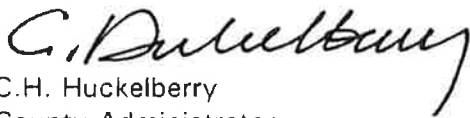
July 5, 2018

Page 3

concerns were raised in the attached April 10, 2018 letter directed to the City of Tucson Manager. A copy of this letter was provided to TAA President/CEO Bonnie Allin and Mark McClardy, FAA Western-Pacific Region Airports Division Manager.

In summary, I thank you for the opportunity to comment on the Draft EIS. We appreciate the work and effort put in by all parties to advance this essential step in improving air safety and capacity at TIA.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/anc

Enclosure

c: Dr. John Moffatt, Director, Economic Development Office
Michael Ortega, City Manager, City of Tucson
Mike Czechowski, City of Tucson
Paul Kramkowski, Manager, Facility Operations, Management & Real Estate,
Raytheon Missile Systems
Greg White, Chief Financial Officer, Raytheon Missile Systems
Brigadier General Andrew MacDonald, Commander, 162nd Wing AZ ANG
Col. Sandra Wilson, Mission Support Group Commander, 162nd Wing, AZ ANG
Lt. Col. Greg Hoffman, Deputy Civil Engineer, 162nd Wing, AZ ANG
Alex Briskin, P.E. Chief, Acquisition Environmental and Industrial Facilities Division,
U.S. Air Force
Jared Scott, Chief, Industrial Facilities Branch, U.S. Air Force
Jeff McCann, AFP 44 IPT Lead/Environmental Engineer, U.S. Air Force



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CEL HUCKELBERRY
County Administrator

April 10, 2018

Michael Ortega, City Manager
City of Tucson
255 West Alameda Street, Floor 10
Tucson, AZ 85701

Re: Paul Hendrix Appraisal Dated January 8, 2018 of Parcel H and the proposed land exchange and acquisition related to the Federal Aviation Administration project for a second runway and safety improvements at Tucson International Airport

Dear Mr. Ortega:

As you know the City of Tucson appraised Parcel H with an appraisal dated November 1, 2017, conducted by Beverly Weissenborn that resulted in a value of \$14,500 per acre. The City also had Ms. Weissenborn appraise 16.12 acres of nearby Pima County property on November 3, 2017 with an estimated value of \$32,500 or approximately \$2,000 per acre. This latter appraisal was based on assumptions which essentially reflected the use restrictions as buffer/open space placed on the property considering the adjacent Raytheon uses.

As you know the County has been very concerned about any adverse impacts to Raytheon operations by land uses adjacent to Raytheon, hence we concurred with the Weissenborn November 3, 2017 appraisal, which assessed the land as buffer/open space, and have now sold this property to the City for appropriate conveyance to the Air Force to construct a new south entry for Raytheon. The Paul Hendrix appraisal of January 8, 2018, commissioned by the Tucson Airport Authority, has valued Parcel H at \$27,225 per acre with no indication that the property has been repeatedly identified as a needed buffer to facilitate Raytheon manufacturing expansion at their Tucson facility. While the Weissenborn appraisal for Parcel H considered the design parameters in arriving at the \$14,500 per acre value, it unfortunately mischaracterizes the buffer parcel as allowing development uses subject to adherence to the design criteria rather than being restricted as a buffer. These erroneous assumptions are reflected in the attached appraisal report excerpts, whereby the subject parcel shown in the red "Exclusion area" on the map on page 33 (Attachment 1), which represents the restricted

Mr. Michael Ortega

Re: **Paul Hendrix Appraisal Dated January 8, 2018 of Parcel H and the proposed land exchange and acquisition related to the Federal Aviation Administration second runway Safety Improvements at Tucson International Airport**

April 10, 2018

Page 2

buffer, is treated as though it allows development subject to the use design parameters which is incorrect.

The use of Parcel H, as a Raytheon expansion buffer has been well known and publicly documented since 2012. The Tucson Airport Authority is well aware of this proposed use. Both appraisers should have been informed of this long standing use prohibition, which would have had an effect on their value conclusions, hence the Weissenborn and Hendrix appraisals are inaccurate.

As you know the selected location alternative for Aerospace Parkway was directly related to Raytheon expansion capability, its location was selected after consultation with Raytheon facilities manager, Richard Padilla, now retired. The plan was the result of multiple meetings that included Pima County Administrator's office, the City of Tucson Manager's office, Facilities Commander of the 162nd Wing of the Arizona Air National Guard, Raytheon and Jill Merrick and Jordan Feld of the planning staff of the Tucson Airport Authority.

This present location of the Aerospace Parkway allows for a potential expansion of three new integration manufacturing and test facilities with appropriate and required safety setback zones that appropriately overlap those of the planned Air National Guard Munitions Storage Area, maximizing the use of the land in the buffer. It was this 2012 analysis that resulted in the design location of the Aerospace Parkway. In addition, the Memorandum of Understanding (Attachment 2) signed by the Airport Authority, Raytheon, City of Tucson and Pima County in 2015 clearly articulated the use of Parcel H as a buffer for Raytheon expansion. An article in Arizona Daily Star dated December 26, 2013 by Joe Ferguson, included a detailed map reflecting all the Parcels involved in the land transactions to support the second runway at Tucson International Airport. This newspaper article map clearly shows Parcel H as part of the overall plan.

On September 9, 2014 Taylor Lawrence, President of Raytheon Missile Systems communicated with Senator John McCain regarding the acquisition of the expanded buffer or Parcel H. On September 10, 2015 both you and I communicated with Bonnie Allin, President of the Tucson Airport Authority the need to initiate an environmental assessment for the expanded buffer. Our letter stressed that plans for this buffer were developed nearly three years ago and our letter stated the intent of the buffer was for the purpose of accommodating the possible expansion of Raytheon operations. There has also been numerous references throughout the statement of need and purpose of the environmental impact statement which clearly indicates Parcel H for the purpose of providing a Raytheon expansion buffer.

Mr. Michael Ortega

Re: **Paul Hendrix Appraisal Dated January 8, 2018 of Parcel H and the proposed land exchange and acquisition related to the Federal Aviation Administration send runway Safety Improvements at Tucson International Airport**

April 10, 2018

Page 3

Given all of this public and historic notice regarding the use of Parcel H as a Raytheon expansion buffer, Ms. Weissenborn should have been notified by the City of Tucson and Mr. Hendrix by the Tucson Airport Authority of this use restriction and taken it into consideration as an extraordinary assumption which would have significantly affected the appraisal value.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Huckelberry", written over the typed name and title.

C.H. Huckelberry
County Administrator

CHH/mp

Enclosures

c: Bonnie Allin, President/CEP, Tucson Airport Authority
Mark McClardy, Manager Airports Division, FAA Airports, Western-Pacific Region

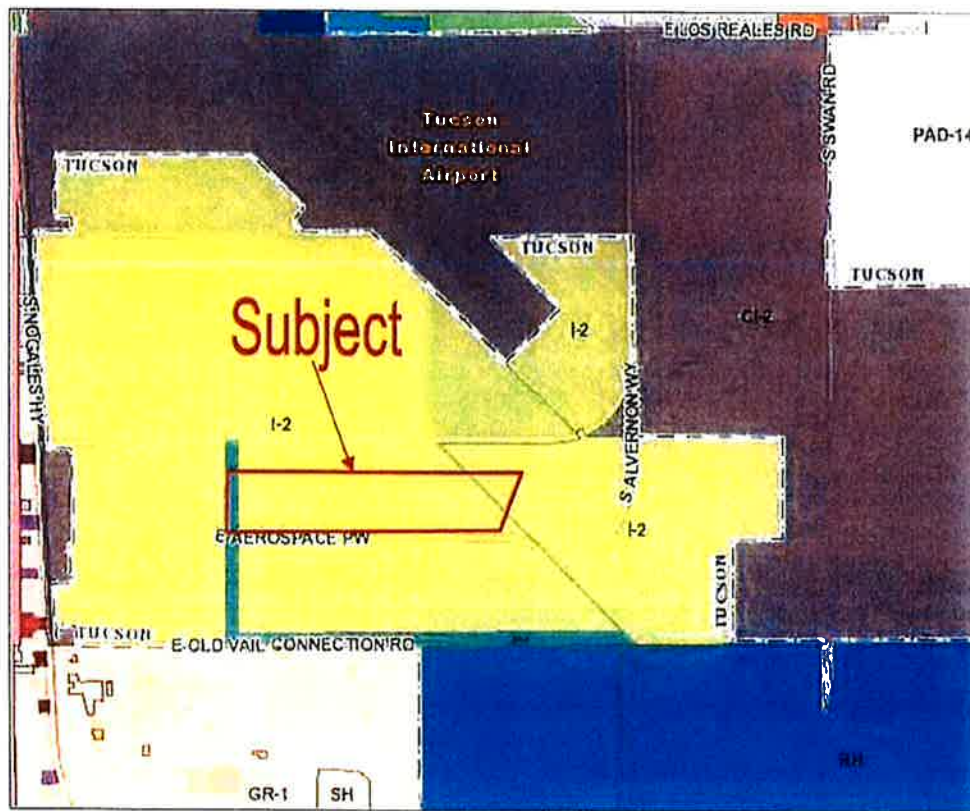
ATTACHMENT 1

ZONING, RAYTHEON IMPACT AREA AND AIRPORT MASTER PLAN

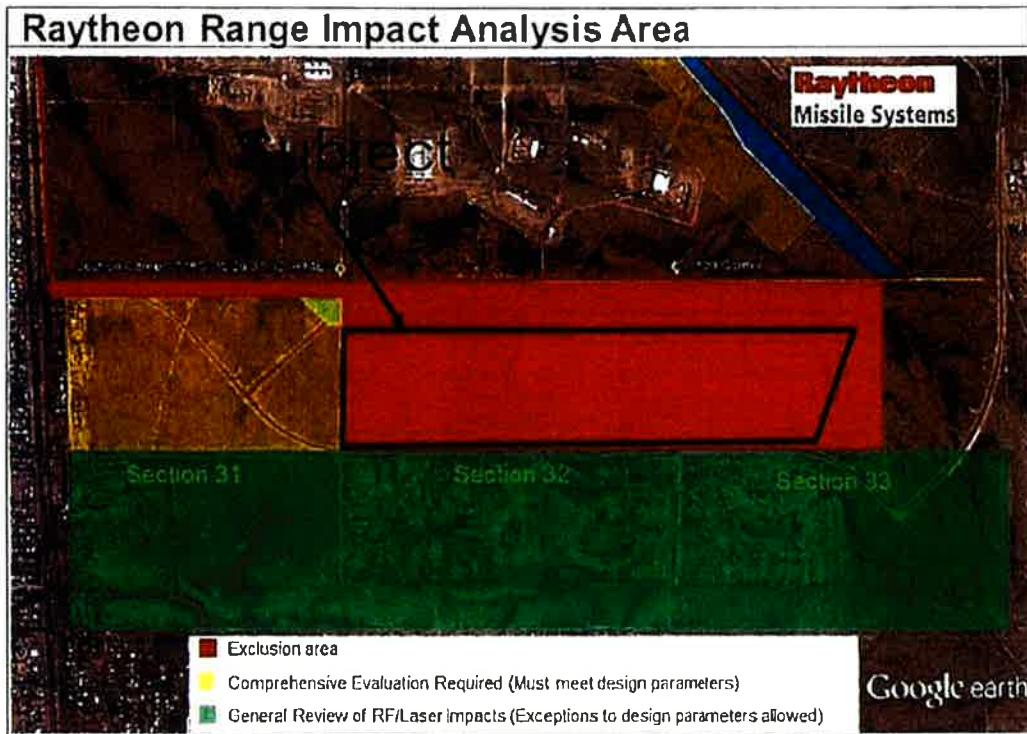
With the exception of a narrow strip along the west boundary, the subject property is zoned I-2, a heavy industrial zoning in the City of Tucson. According to the City of Tucson Land Use Code, the purpose of this zone is to provide for industrial uses that are generally nuisances, making them incompatible with most other land uses. These nuisances may be in the form of air pollutants, excessive noise, traffic, glare vibration, noxious odor or the use of hazardous materials or unsightly appearance.

Examples of permitted uses include general and heavy manufacturing, salvage and recycling, and processing and cleaning. Allowable commercial uses also include administrative and professional offices, automotive service and repair, financial services, food service, research and product development and trade services. Retail trade allowed includes construction materials site, heavy equipment sales, swap meets, vehicle rental and sales and medical marijuana dispensaries. Commercial storage, personal storage and utilities are permitted. Though the reader should consult the Land Use Code for specifics regulations associated with the permitted uses, the I-2 zoning is a fairly liberal zoning that allows a variety of uses.

As shown below, a narrow strip along the west boundary, is zoned P-1, Park Industrial. The P-1 zoning provides for corporate business centers, wholesaling and manufacturing activities and select agricultural, commercial and civic uses. Because the restrictions of the P-1 zoning are much more onerous than those of the I-2 zoning, I have consulted with Mr. John Beall, Principal Planner with the City of Tucson. Mr. Beall believes this odd strip of P-1 zoned land was originally intended to parallel the alignment of a planned transportation corridor that has since been abandoned in favor of the newly constructed Aerospace Parkway. Mr. Beall stated the City of Tucson would support rezoning to I-2.



Raytheon Range Impact Analysis Area: As depicted on the map below, Parcel H is within the Raytheon Impact Area which will require a general review of any proposed development relative to RF/Laser impacts. In addition, there are design and siting limitations relative to existing improvements at Raytheon. Those restrictions that impact Parcel H are highlighted below in yellow. The others pertain specifically to the Aerospace and Defense Park located adjacent west.



A&D Park - Design Parameters

Raytheon
Missile Systems

- **Line of Sight interference from tall buildings**
 - Buildings should not exceed 40 feet AGL within in first ¼ mile of RTN south property line (exceptions require review and approval by Raytheon)
- **Interference caused by radar sources/reflective buildings**
 - Facing walls of any structure shall not be within 15 degrees of perpendicularity to the west corner of Building 849
 - Inside corners of structures shall face to the south (away from Raytheon Facility)
 - Site RF emissions must be reviewed by RTN Review Team
- **Security issues with visibility into AFP44 operations**
 - No structures within 200 to 400 feet of the current Hughes Access Road
 - Buildings should not exceed 40 feet AGL or have any elevated activities with extended line of site into the Raytheon Facility
 - No Foreign Owned / Non-NATO country based Businesses/Corporations
- **Impact to future testing abilities if our customers see the development as a security/performance issue**
 - Well planned /strong coordination with neighbors will minimize this concern
- **Site Access/Traffic Interference**
 - A&D Park facilities parking lots, access points should not be fed off of South Access Road
- **Compatibility with ITF Operations**
 - No structures or activities within 1500 ft of ITF structures

Deviations may be discussed with RTN review team

The site is within the Tucson Airport Master Plan which was revised in 2013-14. This plan recommends heavy and/or large scale industrial development which corresponds to the recommended uses under the City of Tucson General Plan. The Tucson Airport Authority actively monitors land development proposals in the vicinity of the airport and encourages compatible uses. In general, the TAA promotes noise compatible industrial uses and discourages any changes in land use to residential development.

It is noted that about 35 acres at the northeast corner of the subject property is within Airport Environs Zone. There are restrictions pertaining to height limitations of 50 to 85 feet in this area and noise attenuation requirements. This area also lies within a tributary of Hughes Wash. Given these restrictions and the distance from necessary infrastructure, development of this portion of the property is unlikely.

Lastly, it is noted that Parcel H is within the Raytheon Range Impact Analysis Area. Future development will require a general review of RF/Laser impacts. Also, buildings cannot exceed 40 feet in height and must be sited at an angle not to interfere with existing Raytheon facilities. Foreign-owned/non-NATO-country businesses will not be permitted. These restrictions are not particularly onerous, but could discourage some potential buyers.

Based on zoning and the master plan, the only legally permissible use for the subject parcel is for industrial development.

Financially Feasible:

Like the subject, many nearby properties are zoned I-2. Given the zoning, location near the airport and surrounding uses, industrial development appears most likely. At this point it is appropriate to consider the market demand and financial feasibility of development. As noted above, several recent announcements have been made by Pima County regarding companies that intend to locate and/or relocate to the ADT Research and Technology Park. However, in most cases, the County has provided financial incentives.

Like the retail and office markets, the industrial market suffered following the 2008/09 recession. However, beginning in 2013, market statistics have shown steady improvement through the first quarter 2017. In fact, about one year ago Bloomberg named Tucson as the third fastest-growing city for employment in metro areas with a population in excess of 500,000. Mr. Joe Snell of Sun Corridor, Inc. reports 6,000 base jobs created in Pima County between July 1, 2016 and June 30, 2017. This is more than double the number in any year prior. The industrial sector has positively benefited from this job growth, though there has been a recent slowing suggested by the statistics.

Vacancy: The vacancy rate reached a low of 4.1% in the First Quarter 2007. From this point forward, vacancy rates increased steadily to double digits in 2009. The vacancy rate peaked in 2011 when a rate of 12.8% was reported. Since that time the vacancy has declined steadily to a low of 7.6% posted in the first quarter 2017. The second and third quarter 2017 statistics show a slight uptick in the city-wide industrial vacancy rate to 8.0% and 8.3%, respectively. In general, Downtown and the Northwest submarkets have the lowest rates of 3.0% and 3.8%, respectively. The Southwest/Airport submarket reports the highest rate of 16.0%.

Leasing: CoStar reports, several large leases that were signed in 2017 including a 120,000 square foot lease to Keystone at 6050 South Country Club, a 60,405 square foot space leased to Centene Management Company at 6221 South Palo Verde Road and a 60,000

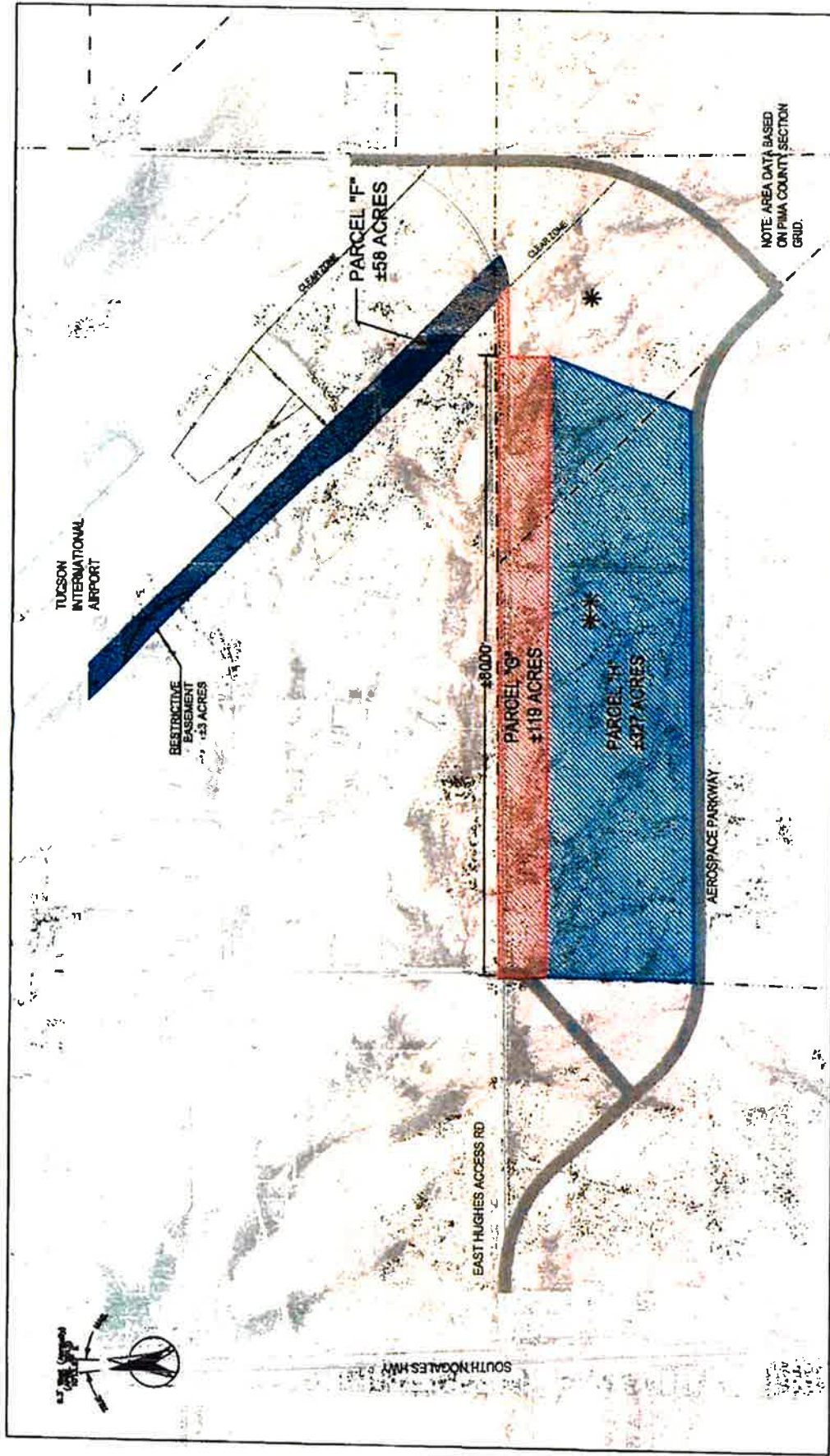


EXHIBIT A - PARCELS FOR TAA RUNWAY, USAF
PLANT 44 BUFFER

HISTORICAL PARCEL INFORMATION
 --- HISTORICAL PARCEL BOUNDARY
 * NOISE LAND
 ** PFC LAND

ATTACHMENT 2

Memorandum of Understanding

Tucson Airport Authority, Raytheon Missile Systems, Pima County, City of Tucson

This Memorandum of Understanding is for the purpose of describing in general terms the current agreement among the Tucson Airport Authority (TAA), Raytheon Missile Systems (RMS), Pima County (County) and the City of Tucson (City) with respect to certain parcels of land needed for safety buffers and/or expansion areas for RMS operations at Air Force Plant 44 (AFP44). This summary reflects the understanding of the key terms following multiple discussions among the parties' representatives.

Background

Pursuant to a separate Memorandum of Understanding dated April 9, 2014 (MOU), TAA and the United States Air Force (USAF) have agreed to a property exchange whereby they will trade approximately 52 acres of USAF-owned land needed for future airport runway safety areas for approximately 80 to 130 acres of TAA-owned land needed for AFP44 buffer and redevelopment areas.

In addition, the MOU between TAA and USAF provides that the fair market value of twelve storage bunkers and supporting infrastructure currently located on the future runway safety areas will be credited to USAF as part of the exchange, in accordance with FAA regulations and eligibility guidelines for reimbursable project expenses.

The approximately 80 to 130 acres to be conveyed to USAF by TAA pursuant to the MOU is commonly referred to among the parties as "Parcel G" and is shown on the attached Exhibit A. The exact boundaries of Parcel G will be determined following initial valuation / appraisals by the USAF and/or as part of FAA's runway redevelopment Environmental Impact Statement (EIS) process. USAF is a cooperating agency with FAA in the EIS.

RMS has requested that property adjacent to Parcel G, referred to as "Parcel H" and shown on the attached Exhibit A, be left undeveloped by TAA (or any other party) and available for use as a buffer or future expansion of its operations at AFP44, including construction of new buildings or other improvements.

Parcel H is estimated to be approximately 300 to 370 acres. The exact area of Parcel H is dependent on the extent of Parcel G, and will be determined once USAF provides the final Parcel G boundaries.

All parties are committed to maintaining and facilitating expansion of RMS operations at AFP44, including completing the exchange between TAA and USAF for Parcel G and securing Parcel H for use by RMS and/or uses which are compatible with RMS.

Agreement

TAA, County and City will enter into a conditional purchase agreement to sell Parcel H for appraised value subject to determination of final Parcel H boundaries and FAA approval. In coordination with RMS, the parties will determine the buyer (County or City) and the interest to be conveyed (e.g., fee title).

Upon determination of the final Parcel H boundaries, TAA will immediately pursue formal FAA release and disposal approval to allow sale of Parcel H.

TAA agrees to leave Parcel G and Parcel H undeveloped and available for RMS buffer and/or expansion use until the exchange with USAF (Parcel G) and the sale to Pima County/City of Tucson (Parcel H) are complete. Following the sale, the County/City agree to hold Parcel H undeveloped and used as RMS buffer and/or available for RMS expansion or other compatible uses, such that if and when such expansion is necessary, in any form, it can proceed quickly and unencumbered.

If Parcel G or Parcel H is needed before the exchange and/or sale can be completed, TAA will offer to enter into a short-term land lease with Raytheon and accelerate the sale or other transfer of property (Parcels G and/or H, as necessary) to the County or City.

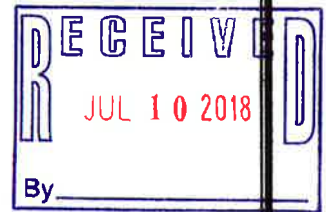
This MOU will terminate if the exchange and sale described above has not occurred within seven (7) years of the Effective Date of this MOU, unless otherwise extended by agreement of the parties.

All proposed transactions will be subject to FAA and, if applicable, USAF/Department of Defense regulatory review and approval and must comply with all applicable laws and regulations.

Effective Date: _____

Tucson Airport Authority By: <u>[Signature]</u>	Raytheon Missile Systems By: <u>[Signature]</u> 12/1/15
Pima County By: <u>[Signature]</u> 12/1/15	City of Tucson By: _____

**COMMENT FORM
PUBLIC HEARING
TUCSON INTERNATIONAL AIRPORT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 21, 2018**



Welcome to the Public Hearing for the Federal Aviation Administration's (FAA) Environmental Impact Statement (EIS) for the Proposed Airfield Safety Enhancement Project for the Tucson International Airport. This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at tonight's meeting, or mail to the address below not later than 5:00 p.m. Pacific Daylight Time **July 9, 2018**.

Before including your name, address, telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Input for 2nd Runway Upgrade at TIA

The proposed action at Tucson International Airport (TIA), to upgrade the southern, second runway, has multiple benefits which justify moving forward with the project. The primary factor, to increase the safety of airport operations, and secondary, to increase capacity at TIA, justify moving forward, given the minimal environmental impacts, which can be mitigated.

Additional residual benefits include keeping U.S. Air Force (USAF) Plant 44, (Raytheon) at an equivalent operational capability; improving the effectiveness of the 162nd Wing, (AZ ANG) operations; and potentially positively impacting operations at Davis Monthan AFB. These additional benefits strengthen the community support for this project.

Moving forward with this project is in the best interest of the FAA, TIA, and all other stakeholders. To not do so would be a travesty.

p40

Submit comments postmarked by July 9, 2018 to:

Mr. David B. Kessler, M.A., AICP
Federal Aviation Administration
Western-Pacific Region
Airports Division, AWP-610.1
15000 Aviation Boulevard
Lawndale, California 90261

FROM (Please Print) Your Name:

EUGENE D. SANTARELLI

Address:

TUCSON RESIDENT

LT GEN (R), USAF

GSRELLI@AOL.COM



CITY OF
TUCSON

DIRECTOR

PLANNING &
DEVELOPMENT
SERVICES
DEPARTMENT

Mr. David B. Kessler, M.A., AICP
Regional Environmental Protection Specialist
Federal Aviation Administration, Western-Pacific Region, Office of the Airports
15000 Aviation Blvd, Lawndale, CA, 90261

Mr. Kessler,

The City of Tucson appreciated the opportunity to comment on the Draft Environmental Impact Statement for the Proposed Airfield Safety Enhancement Project at Tucson International Airport (TIA). We have reviewed the Draft and appreciate both the importance of the project for maintaining safe and effective operations at TIA and the relatively light impact of the proposed alternative.

We did note that 74 residential units within the City will be impacted by changes in the noise contours as a result of the proposed project, and acknowledge that you are offering to soundproof single-family, duplex, and multi-family residences, and acquire and provide relocation assistance for those in model homes. These efforts to mitigate the impact of the proposed safety enhancements support a continued positive relationship between TIA and the community.

P41

Sincerely,

Scott Clark

Interim Planning and Development Service Director
City of Tucson

July 3, 2018

Mr. David B. Kessler
Regional Environmental Protection Specialist
U.S. Department of Transportation
Federal Aviation Administration
Wester-Pacific Region Office of Airports
15000 Aviation Boulevard
Lawndale, California 90261

RE: TUS – Proposed Airfield Safety Enhancement Project

Dear Mr. Kessler:

We are in receipt of your June 29, 2018 letter concerning the wording on a marketing document, "Tucson Airport Authority Military Support". The wording on the document was not intended to imply that a runway would be designated solely for use by the Air National Guard.

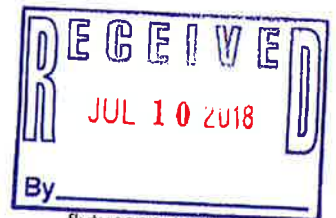
The document has been revised to clarify the purpose of the proposed Airfield Safety Enhancement project, which we understand is subject to completion of the environmental impact statement and the issuance of a record of decision by the FAA.

"The \$180 million Airfield Safety Enhancement project at TUS will incorporate improvements for the benefit of all users, including the Air National Guard. The project will include construction of new taxiways, and relocation and reconstruction of an existing runway to ultimately provide TUS with two, full-length, parallel runways."

Thank you for bringing this to our attention. We apologize for any confusion it may have caused.

Respectfully,


Bonnie A. Allin, A.A.E.
President/CEO



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RESPONSES TO COMMENTS

COMMENT NUMBER	COMMENTS	COMMENT SUMMARY	RESPONSE
AGENCY			
A01	FEMA	Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Pima (Community Number 040073) and City of Tucson (Community Number 040076). Maps revised September 28, 2012. Please note that the City of Tucson, Pima County, Arizona is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.	The relevant FEMA Flood Insurance Rate Map (FIRM) data from FEMA, the City of Tucson, and Pima County has been reviewed. Exhibit 3-19 in this EIS has been updated to reflect revisions to the FIRMS as designated by FEMA including the specific locations of the floodway. The effect of the Proposed Action on floodplains and floodways have been evaluated in accordance with Executive Order 11988. The Proposed Action does not include development within a regulatory floodway as delineated on the FIRM. See Section 3.15 and 4.15 of this EIS for additional information.
A02	FEMA	All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.	Comment Noted. The Proposed Action does not include development within a regulatory floodway as delineated on the FIRM.
A03	FEMA	If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and	Comment Noted. The Proposed Action does not include development within a regulatory floodway as delineated on the FIRM.

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COMMENT NUMBER	COMMENTER	COMMENT SUMMARY	RESPONSE
A04	FEMA	<p>storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.</p> <p>Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision.</p>	<p>Comment Noted. The Proposed Action does not include development within a regulatory floodway as delineated on the FIRM.</p>
A05	FEMA	<p>Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements.</p>	<p>The local community's floodplain manager was contacted during scoping for information on local floodplain management building requirements. See Section 3.15 and 4.15 of this EIS for additional information.</p>
A06	Pima County Flood Control	<p>The existing basin studies and agreements between the TIA and Pima County outline that the TAA will provide detention/retention for airport improvements once the airport development within a watershed reaches an additional 30% development. At that point, the basins will be constructed to a minimum of 50% development volumes. It is not clear from the EIS if the proposed volumes are to bring the airport up to the required 50% development stage or to the 100% development stage as outlined in the Phased</p>	<p>The proposed drainage infrastructure is intended to provide 100% of the capture, conveyance, storage and discharge facilities related to the Proposed Action. If there are other "future" improvements/build-out of the airport, new drainage infrastructure would be added at that time.</p>

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A07	Pima County Flood Control	Detention Agreement between the TIA, Pima County and City of Tucson (City). Please clarify. The runoff calculations using the City's TSMS method utilizes a rainfall of 1.5 inches, the five year, one-hour rainfall, rather than 3.0 inches, the 100-year, one-hour rainfall. The National Oceanic and Atmospheric Administration (NOAA) Atlas 14 rainfall data is presented, but it is not clear that it was utilized in the calculations. Please clarify.	The document was revised with Rainfall P-100 to 3.0 inches per Table 4.1 of COT's SMDDFPM. See Appendix H, Stormwater Drainage Plan.
A08	Pima County Flood Control	The basin factor selected for the flow is 0.048, but the TSMS basin factor should be 0.40 for moderately/highly urban and commercial/industrial development with dispersed flow conditions. The watershed runoff characteristics between the runways/taxiways would more accurately be described as underfit channels, i.e., small inverted crowned street or channels carrying flow, as the flow lines are designed to meet the Federal Aviation Administration's (FAA) requirement for conveying the five-year storm. The TSMS basin factor for an underfit channel is 0.032 for these land use classification. Please ensure basin factors and channel characteristics are appropriate and consistent.	The document was revised. The Basin Factor was changed from 0.048 to 0.038 per Table 4.2 of COT's SSDDFPM, using Moderately/High Urban & Commercial/Industrial with underfit channels. See Appendix H, Stormwater Drainage Plan.
A09	Pima County Flood Control	The weighted runoff coefficients selected appear to be tied to a rainfall depth of 1.5 inches rather than 3.0 within Table 4.3 of the SMDDFPM. The tables linking soil type to drainage area and pervious/impervious area are not straightforward, so it is hard to track exactly how they were selected. Please clarify.	The text was revised to clarify. Rainfall was adjusted per comment A07. Runoff coefficients were selected per table 4.3 of COT's SSDDFPM. A weighted C summary table is now provided in the calculations. Also, composite runoff coefficients are calculated for aggregate areas. See Appendix H, Stormwater Drainage Plan.
A10	Pima County Flood Control	Overall, the discharges presented and associated runoff volumes that would be necessary to offset the	The document was revised per the comment. Discharges have been revised

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A11	Pima County Flood Control	<p>proposed improvements may be underestimated by the updated SMDDFPM method calculations. Please validate the discharges.</p> <p>The February 12, 1992 letter from Parsons Brinckerhoff Engineering Services to the District states that the Hughes Wash watershed should have a 50% threshold retention volume of 5.15 acre-feet and a 100% development retention of 10.3-acre feet. The detention volume for Airport Wash based on offline detention is 23-acre feet and for Airfield Wash based on online detention is 5-acre feet. The volumes based on the phased detention are not given, only the 100% volumes. Required retention volumes for Airport and Airfield watersheds are not clearly defined. Please evaluate and clearly define volumes.</p>	<p>based on changes per comments A07-A09. See Appendix H, Stormwater Drainage Plan.</p> <p>Improvements in subbasin 5 include a 12.2 acre-foot detention basin downstream of the runway improvements but upstream of the confluence with Hughes Wash. Airfield Wash includes a new 7.5 acre-foot detention basin as well as a 3.5 acre-foot refurbished detention basin. The text was revised to clarify. See Appendix H, Stormwater Drainage Plan.</p>
A12	Pima County Flood Control	<p>The proposed basins are upstream of our proposed location and should provide attenuation to the downstream concentration point, outletting from airport land toward the Desert Diamond Casino. Our proposed project had an approximate basin volume of 33-acre feet. The three potential basins shown in the EIS reflect a total of 31-acre feet. The EIS verifies that the locations are acceptable to the FAA given the verification constraints during design. The proposed locations would serve to attenuate local runoff from the increased imperviousness of this project, but may not have as large an impact on the watershed as a whole in comparison to our proposed basin location. Please verify impact.</p>	<p>The proposed detention basins provides more than what is need for the Proposed Action. See Appendix H, Stormwater Drainage Plan.</p>
A13	Pima County Flood Control	<p>An additional consideration is the report does not take into account the breakout from the Hughes Wash watershed into the El Vada Wash watershed identified in the Airport Wash South Basin</p>	<p>The airfield runoff from subbasin 5 which used to runoff through the Raytheon facilities and discharge to Hughes Wash is now being diverted northwest through the</p>

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		Management Study. This breakout flow will not be captured at the proposed basin locations and will still increase the flow volumes at the downstream where flow exits the TAA property and negatively impact the downstream neighborhood along El Vada Wash. Please investigate and document your findings.	infield detention basins and pass through the additional new detention facilities. This should reduce onsite flow reaching Hughes Wash prior to it crossing Nogales Highway.
A14	EPA	EPA requests additional information and has recommendations regarding impacts to waters, air quality, noise, and greenhouse gas emissions in our enclosed comments. We have rated this document EC-2, <i>Environmental Concerns, Insufficient Information</i> .	Comment Noted. See responses below.
A15	EPA	When the Final EIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: ENF-4-2).	Comment Noted.
A16	EPA	The DEIS presents impacts to jurisdictional Waters of the U.S. in acres. Since the impacts are to a wash, please also present the impacts as linear feet in the FEIS.	Chapter 4 has been revised per the comment. The potential impacts to Waters of the U.S. are also provided in linear feet.
A17	EPA	Include verification of impacts from the USACE in the FEIS. Please also include documentation of coordination with the USACE on the extent of impacts and proposed mitigation.	Documentation of coordination with the USACE is provided in Appendix A, Agency and Public Involvement and in Appendix H, Water Resources. During final design, TAA will coordinate with the USACE to obtain required Section 404 permitting (i.e. Section 404 Individual Permit and/or NWP verification) and Section 401 Water Quality Certification from ADEQ.
A18	EPA	Section 4.15.3 of the DEIS only addresses mitigation for stormwater runoff. No compensation is proposed for fill of jurisdictional waters. The FEIS should describe the existing functions of the jurisdictional waters and propose compensatory	Section 4.15.2 and 4.15.3 addresses the potential impacts to 1.1 acres (6,500 linear feet) of the Hughes Wash Tributary #1 and 0.06 acres (200 linear feet) of the Hughes Wash Tributary #2. TAA will be

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		mitigation to offset unavoidable impacts from the proposed project. The Arizona Game and Fish Department and the Tucson Audubon Society operate In Lieu Fee Programs that cover the project area. Either or both of these Programs may have mitigation credits available for purchase.	required to obtain the appropriate permits and authorizations for these potential impacts. Coordination with USACE will continue during the permitting process. The Proposed Action would include the installation of stormwater conveyance facilities within the airfield. In order to accommodate and effectively convey the onsite surface water flows through the infield areas of the airfield, pipe culverts would be utilized to route surface water through the infield areas. During final design, TAA will coordinate with the USACE concerning the final compensatory mitigation to obtain required Section 404 permitting (i.e. Section 404 Individual Permit and/or NWP verification) and Section 401 Water Quality Certification from ADEQ.
A19	EPA	EPA recommends the integration of "green infrastructure" into project design where feasible for stormwater management and treatment, and identification of specific design commitments in the FEIS.	Comment Noted.
A20	EPA	The project is located in the Tucson Air Planning Area. As stated in the DEIS, the Tucson Planning Area was redesignated to attainment for carbon monoxide (CO) on July 10, 2000 by EPA. The area now operates under a maintenance plan for CO and general conformity regulations apply. While the Tucson Air Planning Area remains a maintenance area now, it will cease to be a maintenance area after July 10, 2020. Therefore, while we appreciate the analysis of projected emissions in 2023 and	Comment Noted.

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		2028 that is included in the DEIS for purposes of disclosure, a general conformity analysis is only required for emissions through July 10, 2020. The 2023 and 2028 emissions comparisons are not required for general conformity.	
A21	EPA	EPA appreciates the commitments to minimize construction emissions that are included in the DEIS and encourages the implementation of all feasible minimization measures.	Comment Noted.
A22	EPA	Commit to the minimization measures for construction emissions discussed in the DEIS, in the FEIS and Record of Decision (ROD).	In accordance with 40 CFR § 1505.3, FAA Order 5050.4B, and FAA Order 1050.1F, the Record of Decision (ROD) will contain the final agency determination and approvals for certain federal actions necessary for the implementation the Proposed Action. The FAA will take appropriate steps through federal grant assurances and conditions to ensure that TAA implements mitigation measures identified in the Final EIS and the ROD as conditions of project approval.
A23	EPA	Include commitments to mitigation as described in the DEIS, including offers of sound insulation and acquisition of manufactured/mobile homes, in the FEIS and ROD.	In accordance with 40 CFR § 1505.3, FAA Order 5050.4B, and FAA Order 1050.1F, the Record of Decision (ROD) will contain the final agency determination and approvals for certain federal actions necessary for the implementation the Proposed Action. The FAA will take appropriate steps through federal grant assurances and conditions to ensure that TAA implements mitigation measures identified in the Final EIS and the ROD as conditions of project approval.

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A24	EPA	Since noise impacts from airports continue to be a source of controversy in many communities, EPA encourages continued outreach to the impacted residents through the remainder of project planning and development, including methods such as door-to-door interviews, community meetings in community center locations, and translation services.	Comment Noted.
A25	EPA	Include commitments for sustainability and GHG emissions reduction, as discussed above and in the DEIS, in the FEIS and ROD. EPA recommends including such commitments in an Airport Sustainability Plan so that measures can be tracked and implemented. Discuss any Sustainability Plans that have been developed for the airport. EPA encourages Sustainability Plans that cover both GHG emissions reduction activities and other sustainability practices such as water conservation, hazardous materials management, and wildlife habitat preservation.	In accordance with 40 CFR § 1505.3, FAA Order 5050.4B, and FAA Order 1050.1F, the Record of Decision (ROD) will contain the final agency determination and approvals for certain federal actions necessary for the implementation the Proposed Action. The FAA will take appropriate steps through federal grant assurances and conditions to ensure that TAA implements mitigation measures identified in the Final EIS and the ROD as conditions of project approval. Development of a sustainability plan is not a requirement or mitigation measure of the Proposed Action.
A26	EPA	Utilize as appropriate FAA resources such as lessons learned from Airport Sustainability Planning pilots (https://www.faa.gov/airports/environmental/sustainability/) and advisory circulars such as Advisory Circular (AC 150/5370-10F) in 2011 which includes recommendations and testing protocols for use of flyash in concrete, recycled concrete aggregate, and hot-mix asphalt for types of surfaces (https://www.faa.gov/documentlibrary/media/advisory_circular/150_5370_10F.pdf).	The Proposed Action will utilize as appropriate FAA resources.

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P01	Barbara Harper	My comments are for the language in the EIS Statement. As it pertains to the taxiway and the new relocated runway, I feel that they are mainly designated for military, and according to Advisory Circular 150/5190-6, it would be in violation if you built a taxiway and runway for one aeronautical activity. I would like you to have that put in as all aeronautical activities.	The need for the Proposed Action was documented in the Draft EIS in Chapter 1, Purpose and Need. Implementing the Proposed Action including new taxiways and the relocated Runway 11R/29L would improve safety of the entire Airport by reducing the number of airfield incursions, or occurrences involving the incorrect presence of an aircraft, vehicle, or person on the area designated for landing and take-off of aircraft. The Proposed Action is not intended only for military operations. Comment Noted.
P02	Bruce Dusenberry	All of my comments are positive and in the direction of asking that you, on the basis of the draft, approve the proposed project. It is fundamentally a safety enhancement project, and not only the hot spots on the taxiway delta and the confusion between taxiway alpha and 29 right, but also, very importantly, the center parallel taxiway construction between the new runway and the existing runway that prevents the crossing of aircraft from one runway to the next and incursions onto the runway. This is a new safety design of taxiways that we will have at our airport, and that is a huge safety enhancement. So there's those reasons, as well as the Plant 44 munitions bunkers being removed from the active area of our airport and replaced elsewhere. That's good. And the work for the Guard and the transfer of the land for the Air Force and the National Guard are all good things in addition to the safety. So with that said, the last wonderful thing I think about the work you've taken	

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		into account is, it's taken into account all the mitigating actions that need to be taken for environmental noise, and primarily noise on the Pima Pineapple Cactus and the water situation. So those will be mitigated, and they are frankly extremely minimal. You've done a very thorough job of detecting those and addressing those, so there's no impediment to the project as a result of the environmental concerns. So with all that said, it should be approved.	
P03	O.K. Rihl	I've reviewed the data that's been furnished. It answered any question I had. I'm a strong supporter of having this done. The addition of a runway, not only the safety benefits, but as a businessman that travels quite a bit, in the future the potential of having more flights because of more safety and more capacity, I am all for. So I'm speaking in favor of the project moving forward.	Comment Noted.
P04	Dave Culbertson	Being a pilot myself, military, commercial and private, and operating out of Tucson for a number of years, we're long overdue to take care of this hot-spot issue in Tucson. The only thing I would add about the EIS is if you can go back and figure out a way to speed this process up. I think it's unacceptable that we have a safety problem like we do in an airport like this. We're rebounding well after the economic downturn here. Our traffic is increasing. And the fact that we have these safety concerns going forward are unacceptable to me. So whatever you can do to influence congress -- I'm sure you have a lot of pull there in the FAA -- I encourage you to do that. So well done, and we'll	Comment Noted.

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		look forward to getting these improvements started and going on from there.	
P05	Janice Brundage	I am very much in favor of this plan. I believe it's a safety issue, and I think one of the primary focuses in aviation is to make sure that the people are safe. It seems to me that it will provide much more flexibility. This is a multi-use area, between the Air Guard F-16's and the airline passenger vehicles, and it extends the taxiing area so that we're assured safe travels. Tucson has an airport that continues to strive to get busier, and if we ever have those increased flights, I think it makes great sense. I have no problems with the noise that may be poised because I know it's a safer arrangement.	Comment Noted.
P06	Barbara Harper	I did discuss with you a brochure that was issued last October on the support of military at the airport. Attached is that brochure. Please note that the first paragraph does not mention benefits to other aeronautical activities just the military. This assumption leads one to believe that the new project of taxiways and runways is all for the military.	The brochure was published by TAA not FAA. The need for the Proposed Action was documented in the Draft EIS in Chapter 1, Purpose and Need. Implementing the Proposed Action including new taxiways and the relocated Runway 11R/29L would improve safety of the entire Airport by reducing the number of airfield incursions, or occurrences involving the incorrect presence of an aircraft, vehicle, or person on the area designated for landing and take-off of aircraft. The Proposed Action is not intended only for military operations. Chapter 4, Section 4.12.2.1 Runway Usage states, "In general, the distribution of aircraft operating in the 11/29 direction is expected to be more evenly distributed between the two runways resulting in an

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			increased use of Runway 11R/29L by large jet and military operations, and a corresponding decrease in use of Runway 11L/29R.” Please also see correspondence in this Appendix K from TAA dated July 3, 2018, which confirms the wording on the brochure was not intended to imply that the runway would be designated solely for use by the Air National Guard.
P07	Barbara Harper	Chapter 1, 1.2.1 Description- The Tucson Airport is owned by The City of Tucson and leased to the Airport Authority as stated in the latest lease. Chapter 2 Likewise for 2.3.2.1 Ryan Airfield is owned by the City of Tucson.	The text in Chapter 1 of the Final EIS has been revised to clarify. “The City of Tucson is the owner and TAA is the operator of TUS.” Chapter 2 has also been revised to clarify. “RYN is owned by the City of Tucson. TAA has a long-term lease with the City of Tucson to operate RYN.”
P08	Barbara Harper	Chapter 13, 3.13.1 Socioeconomics-Although this issue is covered, there is nothing said about sociotechnical systems.	The FAA is not certain what the commenter means by sociotechnical systems. The EIS was prepared in compliance with the National Environmental Policy Act of 1969, as Amended (NEPA) and Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations (C.F.R.) Parts 1500-1508), as well as FAA’s policies and procedures for complying with NEPA found in FAA Order 1050.1F, <i>Environmental Impacts: Policies and Procedures</i> and FAA Order 5050.4B, <i>NEPA Implementing Instructions for Airport Actions</i> .

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			For the evaluation of how elements of the human environment such as population, employment, housing, and public services might be affected by the Proposed Action see Section 3.13 and Section 4.13 Socioeconomics, Environmental Justice, and Children's Health and Safety Risks.
P09	Barbara Harper	A Blast Pad is mentioned for the new runway, but am unable to locate its position at the airport.	As described in Section 1.4 Description of the Proposed Action, the Proposed Action includes the following element: Construct/Maintain AANG Extended Blast Pad: This element would construct/maintain the AANG blast pads for Runways 11L/29R and 11R/29L and paint/mark as non-runway/taxiway pavement. The blast pad areas would be just beyond the runway ends. Per Advisory Circular 5300-13A, the blast pad is a surface adjacent to the ends of the runways provided to reduce the erosive effect of jet blast and propeller wash. A blast pad is not a stopway. FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the United States as set forth under 49 U.S.C. § 47101 (a)(1). TAA has completed a number of airfield studies for TUS to analyze, categorize, and recommend mitigations to enhance safety. Several of
P10	Barbara Harper	As has been noted, the Hotspots and Runway Incursions are covered briefly in the draft. However, I would like to add that 11R/29L is still very difficult to identify from the air and most likely will continue to add to wrong runway landings. The FAA's team has recommended that there be threshold markings and nothing has been done to	

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		date. These markings are essential to identifying the correct runway assigned by the airport ATC controller.	these recommendations were implemented with the approval of the FAA. The need for the Proposed Action is to ensure that TUS operates in the safest manner possible and to reduce the potential risk of runway incursions to the extent practicable. With the Proposed Action, Parallel Runways 11R/29L and 11L/29R would both measure 10,996 feet by 150 feet and have parallel thresholds at both ends to enhance visual acquisition of the runway end by pilots in the air.
P11	Barbara Harper	The lessee, Tucson Airport Authority, upon demolition of the businesses on the West side of the airfield for the new taxiway and runway, will NOT relocate them. This decision has a significant impact to their businesses, (Double Eagle, Velocity Air, Civil Air Patrol).	As part of the Proposed Action described in Chapter 1, Purpose and Need, one of the elements is to construct a bypass taxiway, which includes the demolition of four existing buildings and hangars in that area. TAA currently has short term leases with Velocity Air and Double Eagle for these facilities. TAA has notified these occupants of the potential that these facilities would be demolished and that they would need to move from their current location. There are available facilities elsewhere on airport property if they choose to remain at TUS after their lease is completed.
P12	City of Tucson	The City of Tucson supports the Proposed Airfield Safety Enhancement Project for the Tucson International Airport, in Tucson, Pima County, Arizona. The City will work with all partners to ensure the transfer of "Parcel H", from the Tucson Airport Authority to Raytheon, will move forward as	Comment Noted.

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		quickly as possible. This will help facilitate the timely completion of this project overall.	
P13	TAA	<p>TAA has reviewed our noise mitigation records and offer the following revisions to the text on page 4-128: Of the 78 housing units in the significant increase area of the Future (2028) Proposed Action noise contour, eight single-family units and three multifamily units have been previously sound insulated. This leaves 67 dwelling units that are to be mitigated in the following manner. In order to be eligible for sound insulation the interior noise levels must be at DNL 45 dB or above. For the purposes of mitigating the significant noise increases, the following actions would occur:</p> <ul style="list-style-type: none"> • Offer to sound insulate 27 single-family housing units • Offer to sound insulate four two-family housing units • Offer to sound insulate 17 multi-family housing units • Offer 19 manufactured/mobile housing units acquisition. Since mobile homes cannot be effectively sound insulated because of the nature of the home to be able to be moved from place to place, the owners of the 19 mobile homes within the area of 1.5 dB increase within the DNL 65 dB noise contour for the Future (2028) Proposed Action would be given an offer for acquisition and residents would be offered relocation assistance per the Uniform Relocation Assistance and Real Property Acquisition Act. TAA has effectively 	The document was revised with the updated information per the comment.

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		relocated other mobile home parks in the past under 14 C.F.R. Part 150. Please globally revise the EIS based on this information (including, but not limited to, the exhibits, tables, and text noted in Comments #2 through #8).	
P14	TAA	Update Exhibit 4-19 per the information in Comment #1	The document was revised with the updated information per the comment.
P15	TAA	Update Tables 4-40 and 4-41 per the information in Comment #1	The document was revised with the updated information per the comment.
P16	TAA	Update Table S-1 per the information in Comments #1	The document was revised with the updated information per the comment.
P17	TAA	Update Table 4-37 and 4-38 per the information in Comment #1	The document was revised with the updated information per the comment.
P18	TAA	Update Table 4-32 per the information in Comment #1	The document was revised with the updated information per the comment.
P19	TAA	Update Table 4-28 per the information in Comment #1	The document was revised with the updated information per the comment.
P20	TAA	Update text on page 4-156 to be consistent with Comment #1	The document was revised with the updated information per the comment.
P21	TAA	The Lesser Long-nosed Bat is no longer a Federally listed Comment species under the Endangered Species Act. Please revise the EIS accordingly (including references to the suspension of night grading activities as a mitigation measure).	The commenter is correct. The lesser Long-nosed bat was removed from the Federal List of Endangered and Threatened Wildlife by the U.S. Fish and Wildlife Service per the Federal Register Notice 83 FR 17093 published April 18, 2018 and effective on May 18, 2018. The document was revised per the comment. The lesser long-nosed bat is still considered protected by Pima County Ordinances until such time as they are updated.

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P22	TAA	Page 4-28 Section 4.5.2.1 Middle of first paragraph: Replace reference to shovel-nosed snake with rufous-winged sparrow.	The document was revised per the comment.
P23	TAA	Page 4-28 Section 4.5.2.1 Last paragraph: Insert line space before Western Red Bat header.	The document was revised per the comment.
P24	TAA	Appendix H, page 6 Add El Vado Wash to Figure 3 between the Airport Property Boundary and the General Study Area Boundary	The exhibit has been revised per the comment. The location of the El Vado Wash was identified from the Pima County Information Technology Departments WASH Geographic Information Systems WASH map. The label on the exhibit was also moved to be more easily identified and to decrease confusion.
P25	TAA	Appendix H, Table 3.3 and 4.3a In Drainage Area 2, change the outfall location to: Nogales Hwy to Valencia Wash.	The document was revised per the comment.
P26	TAA	Appendix H, Table 3.3 and 4.3a In Drainage Area 3, change the outfall location to: Nogales Hwy to El Vado Wash.	The document was revised per the comment.
P27	TAA	Appendix H, Page 10 The second sentence in the first paragraph of Section 4.2 indicates the Proposed Action improvements are entirely located within the Airfield Wash watershed. This is incorrect. The Proposed Action improvements are located within the Airfield Wash and Hughes Wash watersheds (see Comment #16 for additional details). Please revise the EIS globally, as necessary, to incorporate this comment.	The document was revised per the comment.
P28	TAA	Appendix H, Page 11 The first sentence in the first paragraph of Section 4.3 indicates Airfield Wash watershed is made up of 6 sub-basins. This is incorrect. Three sub-basins make up Airfield Wash watershed (sub-basins 2, 3, and 4). Sub-basins 5	The document was revised per the comment.

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		and 6 drain to Hughes Wash and therefore, are part of the Hughes Wash watershed. Sub-basin 1 drains to Airport Wash and therefore, is part of the Airport Wash watershed.	
P29	TAA	Appendix H, Exhibits 1 through 6 The outfall from sub-basin 3 is shown connecting to Santa Clara Wash. This is incorrect. The outfall from sub-basin 3 drains to El Vado Wash (which also needs to be shown in [added to] these Exhibits).	The document was revised per the comment.
P30	TAA	Appendix H, Page 16 Add the report <i>Airport Wide Drainage Update Final Report</i> , prepared by Stantec Consulting, 2004 to the References. This report is referenced in Section 3.0 on page 8 of Appendix H.	The references section was revised. The word "Draft" was removed from the title of the Stantec Consulting report for clarification.
P31	TAA	Appendix H, Page 6 Change the last sentence in paragraph located above Figure 3 to: Hughes Wash conveys flow from subbasins 5 and 6 (see Exhibit 5 in Appendix C) and flow from AFP 44 and ultimately discharges west of Nogales Highway south of Hermans Road.	The document was revised per the comment.
P32	TAA	Appendix H, Top of page 7, second line: Replace Hermans Road with Aero Park Blvd.	The document was revised per the comment.
P33	TAA	Appendix H, Page 9 Change Section 3.3 header to: Airfield Wash, Airport Wash, and Hughes Wash Hydrology	The document was revised per the comment.
P34	TAA	Appendix H, Page 9 Change the first sentence of the first paragraph to: There are three distinct stormwater outfalls from the Airfield Wash watershed, two distinct stormwater outfalls from the Hughes Wash watershed, and one distinct stormwater outfall from the Airport Wash watershed (see Exhibit 5 in Appendix C).	The document was revised per the comment.

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P35	TAA	Appendix H, Page 9 Change the third sentence of the first paragraph to: These six subbasins of Airfield Wash, Airport Wash, and Hughes Wash watersheds are analyzed to determine the peak discharges reaching each outfall.	The document was revised per the comment.
P36	TAA	Appendix H, Page 9 Change the header of Table 3.3 to: Airfield Wash, Airport Wash, and Hughes Wash Watersheds Existing Conditions Subbasin Discharge	The document was revised per the comment.
P37	TAA	Appendix H, Page 11 Change the header of Table 4.3a to: Airfield Wash, Airport Wash, and Hughes Wash Watersheds Proposed Conditions	The document was revised per the comment.
P38	TAA	EIS Exhibits showing the General Study Area Boundary incorrectly label the eastern boundary as S. Swan Road. The eastern boundary of the General Study Area does not coincide with a road. For reference purposes, consider labeling S. Swan Road and S. Wilmot Road (located west and east, respectively, of the General Study Area eastern boundary).	All of the exhibits showing the General Study Area have been revised per the comment.
P39	Pima County Administrator	Clarification should be made as to the language regarding "TAA would make available a parcel of land identified as Parcel H to the USAF for AFP 44 as needed." During our numerous meetings, in preparation of the Draft EIS, I was under the impression that Parcel H could be acquired now through the appropriate disposal process and the Air Force may not accept the property until it is needed. If this sentence is taken literally, one could assume the property will be retained by TAA until the Air Force states it is needed. As planned, this parcel, less the property needed by the AANG of approximately 55 acres will be acquired using City	The text "as needed" has been deleted from Section 1.4.1 of the EIS. However, Section 1.4.1 states that FAA would release TAA from its Federal obligations for the airport land located between the former East Hughes Access Road and the new Aerospace Parkway. TAA will continue to hold title to the interest in the property until the USAF formally notifies TAA that it needs the property and obtains appropriate authorization from Congress to acquire the property. At this time, Congress has not authorized the USAF to

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		of Tucson funds obtained from the Raytheon Annexation Fund. This transaction needs to proceed as soon as practically possible to assure Raytheon that they have the option of expanding their operations in Tucson. This simply means the acquisition of the property needs to occur now, not "as needed" by the USAF or Raytheon.	acquire this parcel of land for expansion of AFP 44. Since the USAF is the owner of existing AFP 44 land and Raytheon Missile Systems is its tenant, it is incumbent upon the USAF, as the owner, to indicate to TAA if and when it wants to expand AFP 44 using TAA Parcel H.
P40	Eugene D. Santarelli	The proposed action at Tucson International Airport (TIA), to upgrade the southern, second runway, has multiple benefits which justify moving forward with the project. The primary factor, to increase the safety of airport operations, and secondary, to increase capacity at TIA, justify moving forward, given the minimal environmental impacts, which can be mitigated. Additional residual benefits include keeping U.S. Air Force (USAF) Plant 44, (Raytheon) at an equivalent operational capability; improving the effectiveness of the 162nd Wing, (AZ ANG) operations; and potentially positively impacting operations at Davis Monthan AFB. These additional benefits strengthen the community support for this project. Moving forward with this project is in the best interest of the FAA, TIA, and all other stakeholders. To not do so would be a travesty.	Comment Noted.
P41	City of Tucson	We have reviewed the Draft and appreciate both the importance of the project for maintaining safe and effective operations at TIA and the relatively light impact of the proposed alternative. We did note that 74 residential units within the City will be impacted by changes in the noise contours as a result of the proposed project, and acknowledge that you are offering to soundproof single-family,	Comment Noted. The document was revised with updated information from TAA. Therefore, the total number of residential units potentially impacted by the Proposed Action is now 78. See Section 3.12 and Section 4.12 Noise and Noise-Compatible Land Use.

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		duplex, and multi family residences, and acquire and provide relocation assistance for those in model homes. These efforts to mitigate the impact of the proposed safety enhancements support a continued positive relationship between TIA and the community.	
P42	TAA	The wording on the "Tucson Airport Authority Military Support" document was not intended to imply that a runway would be designated solely for use by the Air National Guard. The document has been revised to clarify the purpose of the proposed Airfield Safety Enhancement project, which we understand is subject to completion of the environmental impact statement and the issuance of a record of decision by the FAA. "The \$180 million Airfield Safety Enhancement project at TUS will incorporate improvements for the benefit of all users, including the Air National Guard. The project will include construction of new taxiways, and relocation and reconstruction of an existing runway to ultimately provide TUS with two, full-length, parallel runways."	Comment Noted.

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