

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Ms. Cheri Grubby on March 9, 2009

Please accept this letter and the few attachments as my written comments for your review at this time.

Over the course of the past 3½ years or so many letters, articles, meeting minutes, etc...have been entered into the County's public record regarding the issue of the runway expansion at Carroll County Regional Airport. Very little of this material was entered in the now Draft Environmental Assessment by Delta Airport Consultants. Time does not allow me to pull from the public record on file all the material which should be entered as comments for this hearing. I would, however, like to request that a portion, if not all, of what has previously been submitted to the county to be reviewed for the reasons of the Environmental Assessment. In particular, Carroll Joint Neighborhood Association (CJNA) submitted a large 3-ring (white) binder in which contains many items regarding environmental issues.

**Response:**

*Public Comment was encouraged throughout the EA process and comment cards were available at each of the four public open houses associated with the project. All comments received at the Open Houses and those comments that were submitted to the County and Delta during the EA study were included in the report appendix. Comments submitted during the Master Plan development that did not directly pertain to the EA document have not been included.*

Also, my understanding is that Carroll County Regional Airport does not own or have within its vicinity and emergency "foam" truck, nor do any of our local fire departments. With the projected increase of air traffic one can only assume there will also be an increase of potential dangers (God forbid). It has been stated part of the justification for the runway expansion is for safety reasons but we all know aircraft type of accidents usually and typically happen within miles of a runway during an approach or takeoff. So my concern for safety pertains to the areas and communities north, east, south, and west of airport property. Will the county obtain funds from the FAA to purchase this kind of safety equipment to help insure immediate response and control of such a situation for aircraft type of accidents? Will this yet be another burden the taxpayers of this county will endure for this project? Is it a requirement to have this type of equipment in the near vicinity of an airport the size of which is proposed for Carroll County Regional Airport? We must not forget we have many schools, daycares, businesses, and residential homes as well as farms in the current flight paths.

**Response:**

*FAA regulations require all airports with commercial service to provide aircraft rescue and fire fighting (ARFF) services during air carrier operations. As Carroll County Regional Airport (DMW) is not a commercial service airport, these regulations for fire rescue services do not apply. The 2007 Master Plan Update notes that emergencies at the airport are handled by the local Westminster Volunteer Fire Department.*

*The FAA has designated trapezoidal areas on each end of the runway as the Runway Protection Zone (RPZ). The purpose of the RPZ is to enhance the protection of people and property on the ground. Control is preferably exercised by fee simple land acquisition of the RPZ area and residential land uses and places of congregation are prohibited in this area. The development alternatives depicted in the EA propose the acquisition of land within the RPZ areas.*

We have been told many times de-icing will not take place at CCRA. I understand it may be typical not to de-ice for the recreational/weekend hobbyists who fly only when weather permits. But once the increased projected amount of corporate jets utilize the airport as a fuel stop how can we be assured that these hazardous materials will not be used and in some way get into the surrounding ground water, many streams, and ponds in the area. Runoff ponds and containment areas can fail. Most, if not all, of the homeowners on the north/west end of the airport are on wells by the way.

**Response:**

*Airport management confirmed the airport does not deice aircraft and has no intention of doing so in the future. Airports that do perform deicing of aircraft are required to obtain stormwater discharge permits under The National Pollutant Discharge Elimination System (NPDES) program to ensure that wastes from deicing operations are properly collected and treated.*

Mitigation of vibrant, alive, existing wetlands truly saddens me. If the studies and measures to mitigate (destroy the existing) prove to be worth of implementing this project then we can all thank these decision makers for the loss of wildlife, plant life, and other natural features we now enjoy. Maybe, just maybe, these displaced birds, small animals, frogs, insects, etc...will escape without death and relocate to my backyard. The destruction of these wetlands has been ever so hard for me to grasp how our county, not to mention our state, would allow this to happen. With the ever changing earth these types of habitats, big or small, are crucial. I will never be convinced there is a greater good coming from this massive project for an unnecessary, unwanted, unjustified expansion. Is it really worth the areas around the airport being destroyed?

Noise, air & light pollution, economic justification, increased dangers to the communities, safety, increased dangerous hazardous materials on site, displacement of residences and businesses, farmland paved over, wildlife destruction, loss of trees, property devaluations, and our rural environment being compromised are just a few areas of great negative impact this project holds for citizens in the immediate vicinity of Carroll County Regional Airport.

**Response:**

*The EA report reviewed each of the 18 environmental impact categories as defined by FAA Order 5050.4B and determined that no significant impacts would occur as a result of the proposed action. Coordination with the FAA, Maryland Department of the Environment (MDE), and U.S. Army Corps of Engineers (ACOE) is ongoing to mitigate wetland impacts. The proposed development plan would impact approximately five acres of wetlands due to the grading and construction of the replacement runway, associated safety areas and additional tree clearing in wetland areas. Prior to land disturbing activities, permit applications would be submitted to the ACOE and MDE for coordination and approval. Possible mitigation measures include purchasing credits into an existing wetland bank or the creation of new wetlands to*

*replace those that were affected or disturbed by construction. Approximately 6 acres of replacement wetlands would be required for mitigation of the proposed development.*

Thank you for your time reading this. I would like to believe it is not too late to reverse the decision to move forward with this ever increasing costly (in many ways) project and to recommend instead that Carroll County Regional Airport remain the same.

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Mr. Edmund A. Klebe on March 9, 2009

If there was ever any doubt about it, the Environmental Assessment prepared by Delta Airport Consultants Inc. shows that the extension of the DMW runway was a “done deal” from the very beginning of the Master Plan Update process in 2007, and, indeed, since the previous Master Plan Update in 1987. There should be no doubt that regardless of sanctimonious protestations of neutral open-mindedness, certain members of the Carroll County government have looked upon the entire Master Plan update process as an FAA abetted conduit of misnamed “federal” monies from the taxpayers into the coffers of favored entities in an attempt to obscure years of mismanagement of the airport.

I will not, at this time, do more than mention in passing the demonization of anyone opposed to this wasteful project by one member of the Carroll County Board of Commissioners who, without investigation, accused one citizen of deliberately spreading false accusations, or the constant purveyance, either through ignorance or pernicious intent, of statements that the opponents of this project were woefully misinformed, other than to point out that at one point in time this person alleged that the county could institute a curfew if airport operations became too disruptive of community peace and tranquility; this is the same person, incidentally, who maintained that “someone was going to get the money, so it may as well be Carroll County”, thus belying his earlier contention that the expenditure of \$400,000 per job created by this expansion was an appropriate expenditure of taxpayer funds,

I will, however, speak to certain defects in the entire Master Plan - Environmental Assessment process, and will point out some defects in the present environmental assessment document.

First, the FAA mandated process is defective in the manner in which the issue of noise is addressed. By even addressing noise concerns the FAA has tacitly admitted that noise has a multitude of deleterious effects upon the public; however, the FAA then attempts to deny the seriousness of these effects by mandating that noise is to be evaluated using the so-called “Day-Night-Level” which is a calculated number based upon the “expected” fleet mix and “expected” number of operations. In general, this means that unless one is subjected to a near constant 65 decibels of noise, according to the FAA there is no adverse effect. According to this logic, if my neighbor discharges a cannon at 2 AM, there would be no adverse effect on me because it would not equal 65 DNL. As to this particular environmental assessment, the contention that 65 dB DNL will be confined to present airport property must be viewed skeptically since the stated number of aircraft operations upon which this calculation is based is totally and obviously erroneous. This has been pointed out numerous times to the County Commissioners, the present DMW administration, the MAA, the FAA and to Delta Airport Consultants. The response has been that the number of operations is the number of operations used in the master plan and that the FAA has “accepted” this number. Please note that such an answer does not

address the accuracy of this number. This, in turn, implies that whatever the true noise figure is, it will always be reported as being in compliance with FAA standards. Also please note that there is at present no way to measure the actual amount of noise generated at the airport because there are no noise monitors in place.

**Response:**

*Noise contours of specific Day Night Average Sound Level (DNL) levels are developed using the FAA's Integrated Noise Model (INM). Airport specific data is entered into the model to produce contours illustrating the noise exposure in the vicinity of the airport. Although DNL is an average of cumulative noise levels, sound levels of the loudest events control the DNL calculation.*

*While sometimes helpful as a supplemental noise measurement, single event metrics do not accurately depict noise exposure or the overall impact of noise on the community. The metric approved for use in FAA studies is the DNL. DNL represents noise exposure events averaged over a 24-hour period. A 10-decibel (dB) weighting penalty is added to aircraft noise occurring during the nighttime hours (between 10:00 pm and 7:00 am). The 10 dB penalty represents the added intrusiveness of noise events that occur during normal sleep hours, when ambient sound levels are typically about 10 dB lower than during daytime hours. The 10 dB noise penalty equates one nighttime sound event to 10 daytime events of the same level.*

*As noted in the FAA Aviation Noise Abatement Policy (2000), "Because single event metrics by definition are not composites of cumulative events, 100 aircraft operations a day would be no worse than one operation. Similarly, one event at 90 dB would be assessed as worse than 100 events at 89 dB. These effects clearly do not reflect noise impacts or annoyance reactions accurately." Although the FAA has determined DNL 65 dB as the level of significance, it does not mean that no one may perceive sounds levels below that level as annoying. The 65 DNL noise contour for DMW will not impact any noise sensitive areas.*

*While the number of actual operations may vary slightly over the 20 year forecast period, the FAA has approved the forecast from the 2007 Master Plan and the EA has been based upon these figures. The Master Plan states that the forecast for the airport was derived from previous forecasts as well as a review of fuel sales. In addition, trends in the aviation industry, both local and national, as well as the status of DMW as a reliever airport and the potential effects of the nation's focus on improving air transportation security were analyzed to develop the forecast.*

A similar situation obtains on the matter of air pollution; while admitting that Carroll County is a "non-attainment" area for 2.5 micron size particulates (incidentally the size most causative for lung cancer, heart disease and other physical problems in children and the elderly), this assessment asserts that the area will be an "attainment" area by April 2010 based upon "...results from modeling." To make this clear to all, this translates to: "we expect to be in compliance with EPA standards". not we will be in compliance. The

present environmental assessment correctly notes that the closest air quality monitoring station is over 8 miles away, the next closest 18 miles. Thus there is no objective measurement of air quality around DMW, and, given the fallaciousness of DMW operations numbers, any modeling using such numbers must also be fallacious.

**Response:**

*The EPA has identified Carroll County as a non-attainment area for Particulate Matter (PM) 2.5. The EA states that project-related emissions of the pollutants/precursors for which the area is in non-attainment are less than the applicable General Conformity Rule de minimis levels (a measure of whether the increase can be considered minimal). Technical analysis was conducted using the FAA-required model for assessing airport-related air quality impacts, Emissions and Dispersion Modeling System (EDMS Version 5.1). Other computer models used in the analysis included MOBILE6.2 and NONROAD2005, both developed by the EPA.*

*The air quality assessment approach/methodology was selected in consultation with the Maryland Department of the Environment (MDE). As discussed in the EA, although construction of the preferred alternative would cause emissions of the criteria air pollutant and criteria air pollutant precursors to increase, results of the analysis concluded that the emission increase is not considered to be significant. In addition, coordination with the Baltimore Metropolitan Council dated August 29, 2008 indicated that modifications to Pinch Valley Road and Meadow Branch Roads are not considered to be "regionally significant." Consequently, no mitigation measures are required for air quality impacts.*

This same pattern of duplicity exists in the matter of possible adverse effects upon water quality. DMW management has consistently downplayed the danger of damage to water quality, denying that de-icing operations will be carried out at DMW; however, great emphasis is being placed upon establishing an ILS system to facilitate landings by corporate jets under adverse weather conditions. It is a given that corporate aircraft are going to fly in quite adverse weather conditions, one of these conditions being icing. Thus, there will be a demand for de-icing facilities, and this demand will be met regardless of the county administration's lack of foresight. In the past, county authorities have stated that any de-icing needs will be met by putting the aircraft in a hangar prior to flight. Surely such a scenario cannot be taken seriously. The fact is that corporate jets are going to de-ice when necessary and even if such de-icing should take place inside of a hangar, some of this de-icing fluid is sure to be shed from aircraft surfaces and subsequently run off of runway surface. And even if a certain hangar should be designated for de-icing, there is no provision to handle de-icing fluid.

**Response:**

*Airport management confirmed the airport does not deice aircraft and has no intention of doing so in the future. Airports that do perform deicing of aircraft are required to obtain stormwater discharge permits under The National Pollutant Discharge Elimination System (NPDES) program to ensure that wastes from deicing operations are properly collected and treated.*

In paragraph 4.4 of appendix F, Delta points out that a significant portion of airport property is underlain by soluble rock that may collapse and lead to ground water contamination, but there is no discussion of how to fix this situation and the only “mitigation” measure mentioned is monitoring for the appearance of sinkholes. The unfortunate fact is that once a sinkhole has started to form, it is quite probable that the underlying aquifer has already been contaminated. Furthermore, paragraph 6.3 of appendix F points out that several outfalls and retention basins in the site have the potential to lead to contamination of the entire Liberty Reservoir which serves the Baltimore Metropolitan region.

**Response:**

*A statement will be added to the text to clarify that all stormwater retention basins are currently functioning properly and are in compliance with MDE regulations. The text will also note that the basins will be checked periodically to ensure that there are no problems with the system. Appendix F contains the Water Quality Report prepared by Rettew Associates, Inc. to assess the existing conditions of the airport and potential impacts from the project. The water quality report noted that there is the potential for these issues due to the carbonate bedrock that is beneath the airport and much of the county. All stormwater basins with this type of bedrock are at risk for sinkholes, and therefore potential groundwater contamination.*

In paragraph 6.1 of appendix F, Delta points out that the airport has no Spill Prevention Countermeasure and Control Program in place despite having an excess of 46,000 gallons of hydrocarbons stored on site in excess of the 1320 gallon threshold. The lack of such a program is another illustration of the misadministration of the airport.

**Response:**

*The FAA requires that a Spill Prevention Countermeasure and Control (SPCC) Plan that complies with 40 CFR 112 and EPA’s guidance documents for SPCC plans be in place by July 1, 2009 as this was not a requirement until recently. Carroll County is currently working on this project and anticipates its completion by the FAA mandated deadline.*

In paragraph 7 of appendix F, Delta points out the various threats to the City of Westminster water supply through possible well contamination. One of the methods recommended by Delta to reduce this threat is “restrictions on new and expanding industrial and commercial operations” which is interesting because the consistent propaganda from the county authorities has been that the reason for expanding the airport runway is for “industrial and commercial development.” It would seem that a choice has to be made between the Westminster water supply and the chimerical development espoused in the fatally flawed Sage Report, which itself was produced when the previous economic impact report did not provide sufficiently grandiose projections. At this point, it is well to point out that the previous expansion of the airport was also justified with the promise of economic development yet to appear.

**Response:**

*The water quality report conducted by Rettew Associates indicates that there are 11*

*potable water supply (PWS) wells in Carroll County. Of the 11, three are located near the airport and within the project area. All 11 wells were identified as being susceptible to nitrate contamination; however nitrate concentrations of the wells in the project area did not exceed their maximum concentration limit of 10 milligrams per liter. No wells are located on existing or future airport property and no airport development is proposed within the 500' wellhead buffer for any of the three wells in the project area.*

Just as the chimerical economic development contained in the previous master plan of 1987 have failed to come to pass, so also the need for upgrading the present runway to ARC C-III as contained in the 2007 master plan (Section 3, paragraph 3.1.1) which is predicated upon: "... existing tenants at DMW who will be upgrading their facilities to accommodate a future based aircraft in Approach Category C. The specific Approach Category C aircraft that would base at DMW is a Grumman Gulfstream V (G-V)....", seems to be rapidly fading away. Indeed, "existing tenants" seems to have become a "non-existent" tenant, as International Flight Group seems to have unceremoniously departed DMW, to be replaced by the unheralded First Flights. Inc., whose G-IV (N300JA) is presently listed for sale. Will First Flights Inc. also depart the airport? Nevertheless, the upgrade to ARC C-III is also predicated upon 500 operations per year ) which equates to over \$40,000 per operation which cost is to be born by the taxpayers rather than the private aircraft operator.

**Response:**

*DMW is currently leasing hangar space to First Flight for their G-IV based at the airport, which is also a Category C aircraft. The critical aircraft, defined in the 2007 Master Plan Update as the G-V, is also in the fleet of aircraft owned by First Flight. First Flight has established DMW as their Washington area base of operations.*

*People who use our air transportation system pay for the costs of developing America's National Airspace System (NAS) and a portion of public use airports. Included in this group are people shipping packages, private pilots, airline passengers, and employees flying on corporate shuttles. Similar to the national highway systems, much of airport infrastructure is paid for with user taxes on aviation fuels.*

The master plan envisions the construction of a class I ILS with a MALSR on the runway 16 end of the newly constructed runway, however the present environmental assessment does not even mention the problem of light pollution. This light pollution is already a problem because of the rotating beacon at the airport. An ILS with associated so-called "rabbit lights" stretching for 2.5 kilometers northwest from the end of the runway will surely greatly exacerbate this light pollution, and not merely for the airports immediate neighbors, but for the planned astronomical observatory to be built at Bear Branch park located northeast of the airport. There is no explanation, either in the environmental assessment or in the master plan, why the ILS is proposed for only one end of the runway. When questioned about this Delta representatives only pointed to the existence of so-called "circling" minimums, which conjures up the image of a large corporate jet approaching the airport from the north in order to pick up the ILS and circling around at relatively low altitude over residential areas and the local college in order to land into the wind, which the

master plan says prevails from north and northwest.

**Response:**

*The lights proposed for installation at the airport are designed to emit light visible only in specific directions or in certain areas and are not anticipated to impact residential areas.*

Another problem with the environmental assessment is the lack of any discussion of the hazard presented by the two resident Canada geese populations in the vicinity of the airport, both to the south (at the Westminster Community Pond southeast of runway 34, directly south of runway 34 on Wyntryst Drive) and to the north (at the intersection of Indian Valley Trail and Pleasant Valley road).

**Response:**

*The areas mentioned are outside of the project area studied in the EA. There have been no reported incidents of bird strikes at the airport or pilot reports of birds on or near the runway. Projects associated with the preferred development are not anticipated to attract wildlife closer to the airport.*

The environmental assessment also does not discuss what measures of mitigation are to be used when the relocation of Meadow Branch road, immediately adjacent to runway 34, will necessitate destruction of the wet lands adjacent to Krider Church Road. A Delta representative merely stated that the Canada geese populations were “outside” the study area and did not address the wet lands adjacent to Krider Church Road, presumptively because they are also “outside” the study area.

**Response:**

*A wetland survey was conducted for the entire project area, including those areas proposed for acquisition and temporary grading. Wetlands will be impacted with the relocation of Meadow Branch Road. The EA describes that possible mitigation measures may include purchasing credits into an existing wetland bank or the creation of new wetlands to replace those that are affected by construction. The EA further notes that prior to land disturbing activities, permit applications would be submitted to the U.S. Army Corps of Engineers and Maryland Department of the Environment for coordination and approval.*

Edmund A. Klebe  
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Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Mr. John Stephens on March 11, 2009

Ms. Cynthia Parr in an email to me has stated (Copies available if you would like them) there are 250 to 300 jet/turbo operations per month at CCRA. Using the higher number that would be 3600 jet/turbo operations per year. She also states the only way the county has to count operations is by fuel sales. While this may be true how do we count the operations when fuel is not purchased at CCRA? So realistically that number can be reduced. Your EA report states "The DMW (CCRA) Master Plan Update approved December 2007 projects 112,739 general aviation operations for the base year 2005 and forecasts a steady increase in operations to approximately 203, 619 by 2025". Doing the math, using Ms. Parr's figures of 3600 jet/turbo operations as of November, 2008, that would indicate 116,339 operations are non jet/turbo operations. There is a gross misrepresentation/miscalculation of the number of operations at CCRA. This should be clarified in your report and the information supplied to the FAA and MAA. It would appear the number of operations now and in the future is based on guess work and not fact! Table 4-5 seems to contradict the projected GA operations. This table shows a total of 123,455 in 2008. You state your source for this was Master Plan Update, 2007, URS  
There are just too many operation discrepancies for this to be accurate information.

**Response:**

*Follow-up with Ms. Parr confirmed she informed you there are approximately 150-200 jet operations per month at DMW. This number corresponds with the approved forecast from the 2007 Master Plan (MP) Update. The approved forecast was carried forward to the Environmental Assessment (EA). Forecasts of operations at airports without a control tower are based on fuel sales, recent aviation activity, as well as FAA forecast trends for the 20 year forecast period.*

Your report states "Realignment of Meadow Branch Road" but doesn't indicate how or what affect it will have on homes, traffic and wetlands that may exist there. How can you simply say "realignment" without giving details? It also states "Relocate/shift Fuel Farm" but doesn't indicate to where and what affect it will have on the surrounding area. These statements are vague in nature and subject to many questions.

**Response:**

*Each project, including the proposed realignment of Meadow Branch Road, is depicted on the alternative exhibits presented in Chapter 2. Impacts to the environmental categories (i.e. wetlands, compatible land use, etc.) from the projects are described in Chapter 4. The road realignment will not require the relocation of homes or businesses. The project will require the acquisition of temporary grading easements as well as fee simple acquisition to accommodate the road's right-of-way, as illustrated on the alternative exhibits.*

In the report it states "The projects described herein are necessary in order for DMW (CCRA) to ensure the safety of the flying public while at the same time meet the performance requirements for the critical aircraft expected to utilize this facility". Please explain what is meant by "critical

aircraft”?

**Response:**

*The critical aircraft is the most demanding aircraft or group of aircraft that routinely operate (500 operations annually) at the airport. The critical aircraft was defined in the 2007 Master Plan as the Gulfstream V business jet.*

Further on you say “The ongoing development projects identified in this plan will enable DMW (CCRA) to accommodate the growth in aviation demand as well as contribute to the economic vitality of the service area”. Our government has been unable to provide this information. What are your facts and how did you obtain them?

**Response:**

*The proposed projects intend to accommodate the growth in aviation as defined by the approved forecast presented in the 2007 MP Update. The economic impacts to which the EA refers are those described in “A Deeper Assessment of the Economic Impacts of the Proposed Carroll County Regional Airport Expansion” by Sage Policy Group, Inc, March 2007. The report “concludes that the impacts on the broader Carroll County community will be highly positive, translating into substantial investment, job creation, income generation and tax base formation.”*

*Additional references include, the Maryland Aviation Administration’s (MAA) study, “The Regional and Local Economic Impacts of the Baltimore/Washington International Thurgood Marshall Airport and the Statewide General Aviation System,” completed by Martin Associates in 2001; an Executive Summary and Highlights were published in 2007 as updates to the original study. As depicted in the “Highlights: Economic Impact of Maryland’s 34 General Aviation and Commuter Airports” Carroll County Regional Airport generated the following economic impacts:*

**Jobs (Direct, Induced, and Indirect): 145**  
**Personal Income (Direct, Induced, and Indirect): \$9,310,000**  
**Revenue: \$4,962,000**  
**Taxes: \$959,000**  
**Local Purchases: \$2,712,000**

Under the Alternatives section is the following: “The rehabilitate only alternative would not provide adequate runway length to accommodate many of the aircraft operating currently at DMW (CCRA) and would not accommodate a future upgrade to ARC-III. Implementation of this alternative would require a six month runway closing for pavement strengthening”. An ARC-III aircraft can be a DC-9-30 weighing 108,000 pounds and a wing span of 93.3 feet or an F-100 weighing 101,000 pounds and a wing span of 92.1 feet. To my recollection this was never divulged by any government official in Carroll County. Why? As for the six month closing our government officials told us it would have to close for one year. One alternative not mentioned was the building of a parallel runway and keeping the existing runway open while construction was underway. This would eliminate a runway closure and when this project was finished reconstruction of the existing runway could be undertaken. At one of the open house meetings one of the Delta people admitted this alternative was a possibility.

**Response:**

*The "rehabilitate only" alternative is described under the "Alternatives Considered But Not Carried Forward" section of the EA. It was determined early in the screening process that this alternative would not meet the purpose and need and therefore was not included in further analysis. Estimated runway closures were noted in the 2007 Master Plan Update; however, since that time, preliminary design and a Preliminary Engineering Report (Appendix K) was completed detailing more refined construction schedules. The Preliminary Engineering Report states that construction of the preferred alternative could be completed without daytime runway closures. The purpose and need for each of the proposed development alternatives is to develop the airport to an ARC C-III facility, as these aircraft are already operating at DMW today. Although the airport could accommodate larger aircraft, the critical aircraft for DMW as noted in the approved 2007 MP Update is the Gulfstream V.*

This report indicates two named businesses would be relocated but there is no mention of the three private residences to be relocated. Why?

**Response:**

*Property owners directly affected by the proposed airport projects were notified at the beginning of the study and invited to three special meetings throughout the EA process. Preliminary property maps and estimated acres of the proposed fee simple and easement necessary were available to the public at the four open houses associated with the study. Although previously identified in the Master Plan and Airport Layout Plan drawing set, the residential property proposed for relocation has been noted on the alternative exhibits in the final EA.*

Another area reads: "One storm water retention basin on airport property, which receives storm water from the airport runway, was observed within the area most likely underlain by carbonate bedrock. Due to the soluble nature of this formation, the potential exists for the formation of sinkholes, and solution channels beneath portions of the site, which may subsequently increase the risk of potential transportation of dissolved contaminants to the underlying groundwater aquifer". Folks this is a very serious problem to which you offer no solution. We're talking about safety, health and quality of life issues. How can you not offer a solution?

**Response:**

*A statement will be added to the text to clarify that all stormwater retention basins are currently functioning properly and that they will be checked periodically to ensure that there are no problems with the system. The water quality report noted that there is the potential for these issues due to the carbonate bedrock that is beneath the airport and much of the county.*

I believe somewhere in this report I read something about deicing. We were assured by county officials deicing was not going to happen at CCRA. There seems to be miscommunication between Delta and our government. Will dicing take place at CCRA? If so how do you intend to capture the material and assure us it will not make it to our streams, rivers, aquifers and eventually to the Chesapeake Bay?

**Response:**

*The general statement regarding deicing at airports will be removed from the report as it is not applicable to DMW specifically. Airport management confirmed that the airport does not deice*

*aircraft and has no intention of doing so in the future. Airports that do perform deicing of aircraft are required to obtain stormwater discharge permits under The National Pollutant Discharge Elimination System (NPDES) program to ensure that wastes from deicing operations are properly collected and treated.*

Finally, I questioned Ms. Parr about Appendix M and the public comments and the fact that this couldn't possibly be all the public comments, letters and emails pertaining to the EA. I was informed Delta selected the information to be included in the EA. Couldn't one consider this a conflict of interest in that Delta writes the report but only includes selected comments? Why wouldn't you include all of what was received, thus making this appear to be an unbiased report?

**Response:**

*Public Comment was encouraged throughout the EA process and comment cards were available at each of the four public open houses associated with the project. All comments received at the Open Houses and those comments that were submitted to the County and Delta during the EA study were included in the report appendix. Comments submitted during the Master Plan development that did not directly pertain to the EA document have not been included.*

Time simply did not allow me to read the full report. Perhaps that's good for all of us in that my questions and comments may have reached book proportions.

Respectfully submitted,

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410 857-0722

CC: Carroll County Commissioners  
Ms. Cindy Parr  
Mr. Steve Powell  
Mr. Joseph McKelvey

Carroll County Regional Airport  
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Response to Comments  
Submitted by Ms. Robyn Gilden on March 11, 2009

- What is the peak noise level at the airport, how often is it at that level, and how long is it sustained in addition to the 65 DNL average contour?

*No analysis of single event noise or peak noise level has been conducted at DMW as a part of this Environmental Assessment (EA). Noise contours of specific Day Night Average Sound Level (DNL) levels are developed using the FAA's Integrated Noise Model (INM). Airport specific data is entered into the model to produce contours illustrating the noise exposure in the vicinity of the airport. Although DNL is an average of cumulative noise levels, sound levels of the loudest events control the DNL calculation.*

*While sometimes helpful as a supplemental noise measurement, single event metrics do not accurately depict noise exposure or the overall impact of noise on the community. The metric approved for use in FAA studies is the DNL. DNL represents noise exposure events averaged over a 24-hour period. A 10-decibel (dB) weighting penalty is added to aircraft noise occurring during the nighttime hours (between 10:00 pm and 7:00 am). The 10 dB penalty represents the added intrusiveness of noise events that occur during normal sleep hours, when ambient sound levels are typically about 10 dB lower than during daytime hours. The 10 dB noise penalty equates one nighttime sound event to 10 daytime events of the same level.*

*As noted in the FAA Aviation Noise Abatement Policy (2000), "Because single event metrics by definition are not composites of cumulative events, 100 aircraft operations a day would be no worse than one operation. Similarly, one event at 90 dB would be assessed as worse than 100 events at 89 dB. These effects clearly do not reflect noise impacts or annoyance reactions accurately." Although the FAA has determined DNL 65 dB as the level of significance, it does not mean that no one may perceive sounds levels below that level as annoying. The 65 DNL noise contour for DMW will not impact any noise sensitive areas.*

- What specifically will need to be mitigated when it comes to wetlands and air quality?

*The air quality assessment approach/methodology was selected in consultation with the Maryland Department of the Environment (MDE). As discussed in the EA, although construction of the preferred alternative would cause emissions of the criteria air pollutant and criteria air pollutant precursors to increase, results of the analysis concluded that the emission increase is not considered to be significant. In addition, coordination with the Baltimore Metropolitan Council dated August 29, 2008 indicated that modifications to Pinch Valley Road and Meadow Branch Roads are not considered to be "regionally significant." Consequently, no mitigation measures are required for air quality impacts.*

*Coordination with the FAA, Maryland Department of the Environment (MDE), and U.S. Army Corps of Engineers (ACOE) is ongoing to mitigate wetland impacts. The proposed development plan would impact approximately five acres of wetlands due to the grading and construction of the replacement runway, associated safety areas, and additional tree clearing in wetland areas. Prior to land disturbing activities, permit applications would be submitted to the ACOE and MDE for coordination and approval. Possible mitigation measures include purchasing credits into an existing wetland bank or the creation of new wetlands to replace those that were affected or disturbed by construction. Approximately 6 acres of replacement wetlands would be required for mitigation of the proposed development.*

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Mr. Steve Osborne on March 12, 2009

After reviewing the EA report on preferred Option 4, Socioeconomic Impacts, I have one major question. Why is the Farm operation excluded from this report? I have been told that my primary residence would need to be acquired which would be a huge impact on our extensive hog finishing operations. As the owner/caretaker I would not have a residence on the remaining farm parcel since placement of the dwelling in crop land was originally refused by M.A.L.P.

**Response:**

*The farm operation was originally excluded from the Environmental Assessment as this portion of the property was not proposed for fee simple acquisition. While the residence on the property is within the proposed Runway Protection Zone (RPZ), the hog farm is not. Upon further consultation, the FAA has requested that the relocation of both the hog farm business as well as the residential property be analyzed and included in the Final EA document. The RPZ is a trapezoidal area on each end of the runway as designated by FAA. The purpose of the RPZ is to enhance the protection of people and property on the ground. Control is preferably exercised by fee simple land acquisition of the RPZ area and residential land uses and places of congregation are prohibited in this area. Potential home and business relocation sites and negotiation of exact acreage for acquisition will be determined in the land acquisition negotiations to follow the Environmental Assessment project.*

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Ms. Pam Dokas on March 17, 2009

I am submitting this comment so that it will be on the record. I have complained to the FAA on more than one occasion about the planes that fly over my home engaged in dangerous activity such as; rolls, loops as well as what appears to me to be intentionally stalling of their engines. In addition, there is an inordinate amount of circling the same area for extended periods of time. I can think of no reason for this other than practice/training. Isn't there a designated area for this type of activity?

The response that I received from the FAA when I reported this activity was this, "We are not inclined, nor are we capable of responding to this type of complaint". I was advised that if I really wanted to empower myself I should get some high powered camera equipment and get the evidence myself. I have found it impossible to see any identifying numbers on these aircraft with high power binoculars, even when they are flying far to low, which is way to often. I don't believe a lot of them even have identification numbers.

I would like to see all of these small aircraft be required to have GPS so that if you reported a problem in real time, it would be possible to know the identity of the aircraft and take the appropriate action.

This activity along with the extraordinary increase in the amount of air traffic coming and going from the CCRA only became a problem approximately 2 1/2 years ago. I don't know the explanation for the sudden increase. I suspect it is because the County is selling discount fuel. In fact, the previous FBO at the airport claimed they could not make any profit after the County dictated what they could charge for fuel on top of giving an additional discount for their "best customers".

It is not some irrational fear that makes this activity so egregious, it is the noise pollution. I live approximately 10 miles from the airport, in New Windsor. You should know that the environmental impact on our lives is extraordinary. Our dreams of enjoying everything we worked so hard for and spending the rest of our lives in the outdoors gardening and working in the yard, in the peace and quiet, have been destroyed. Now every day has become a challenge to drown out the aircraft even indoors. Sometimes retreating into the basement is necessary when someone is circling overhead, it can drive you berserk!

Pam Dokas  
New Windsor, MD

**Response:**

*New Windsor, Maryland is located approximately 30 nautical miles from the Baltimore Washington International Airport (BWI). Thirty nautical miles (from BWI) is also the distance for which the Federal Aviation Administration (FAA) requires aircraft to be equipped with automatic altitude reporting transponders (Mode C). The New Windsor area is also located between the Carroll County Regional Airport and the Frederick Municipal Airport and several other public and private general aviation airports are also located within this region.*

*It is very likely that the aircraft operations being witnessed are primary flight training students from any one of the above referenced airports who have identified this non-congested area outside of the Mode C radius as a 'practice area'; such activity is quite common and typically in compliance with Federal Aviation Regulations (FAR). The airspace surrounding New Windsor is generally uncontrolled airspace, indicating that Visual Flight Rules (VFR) are in effect and no communications with FAA are required for legal operations. Legal operations would include maintaining a minimum safe altitude of 500 feet above the surface in other than congested areas, and if a sparsely populated area, 500 feet separation from any person, vehicle, or structure.*

*It should also be noted that New Windsor and Union Bridge are located between the Mode C requirement area of BWI and the restricted and prohibited overfly areas surrounding Camp David. As a result, there is a corridor north of New Windsor that would attract general aviation aircraft traversing the area while operating under VFR conditions.*

*It is recommended that the FAA be contacted anytime an aircraft is identified, by registration number, as not operating in compliance with Federal Aviation Regulations.*

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Ms. Mary Kowalski on March 20, 2009

I am writing these comments to be included in the public record regarding the Environmental Assessment of Carroll County Regional Airport. I question whether the public hearing on March 9, 2009 followed proper procedures. We were told at the hearing that the public comments were being made to the FAA, yet there was no one present at the meeting from the FAA. Instead Ms. Parr, a county employee moderated the hearing. Was she also the hearing officer? If our comments were being made to the FAA, shouldn't someone from the FAA been there to act as the hearing officer? The County employee, Ms. Parr, did not appear to be acting as a hearing officer, but rather as a moderator. When Ms. Parr was asked by someone from the public, at the public hearing, if the public present could be given more time to talk, she was unable to make a judgment on that question, and instead turned to someone present who was with Delta Airport Consultants to authorize that decision. Someone from Delta then gave Ms. Parr permission to give the public additional time to talk at the hearing. If Ms. Parr was the hearing officer, it seems that she improperly sought permission from Delta Consultants to make that judgment. If Ms. Parr was only a moderator, then how could a public hearing be conducted with no hearing officer? The way in which the public hearing was conducted was very confusing to the public and gave the impression that there was no hearing officer present.

*Carroll County followed appropriate guidelines for conducting the FAA public hearing as outlined in FAA Order 5050.4B, "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions" Chapter 4, Public Participation. The order states that a public hearing notice must inform the public at least 30-days before the date of the hearing and provide an opportunity for the public to give oral comments. In addition, a transcript of the hearing must be prepared. A public notice of the hearing was published in the Carroll County Times on February 9, 2009 and again on February 23, 2009. The notice was also posted on-line at the Carroll County Government website and postcards were sent to all previous meeting attendees and affected property owners to notify them of the open house and hearing. The hearing transcript, a document of the oral public comments, will be included in the Final EA document. Ms. Parr acted as the moderator by giving a brief overview of the project, why the hearing was being held, and ensured all members of the public had an opportunity to speak. During the meeting, Ms. Parr noted that once a finding from the FAA on the Final EA was received, an additional hearing in accordance with Carroll County guidelines would be conducted with the County Commissioners in attendance.*

In the beginning of the hearing, the public was told that someone from the FAA was on their way to the meeting. Someone from the public then asked if we could wait for their arrival before starting the hearing. The public was told no, and the hearing proceeded without the FAA representative. At the end of the hearing, someone else from the public again questioned who our comments were being made to. We were told they were being made to the FAA. Again, someone from the public questioned why no one was present from the FAA for the hearing, if that was the case. If our comments were being made to the FAA at the public hearing, should

not someone from the FAA have been acting as the hearing officer at the public hearing, or at least been present at the hearing?

*An FAA representative had planned to attend the hearing, but was unable to due to unforeseen circumstances. Attendance from an FAA representative is not required by FAA Order 5050.4B. The hearing was conducted to offer the public an opportunity to comment on the draft EA document. The FAA will receive a copy of the hearing transcript as well as all written comments submitted throughout the comment period and responses.*

In light of the above, I believe that the public hearing on the environmental assessment, held on March 9, 2009 was improperly conducted, and I hereby request that another public hearing be held, specifically on the environmental assessment.

*As noted above, the hearing for the draft EA was conducted properly and in accordance with the NEPA requirements. As Ms. Parr noted during the March 9, 2009 hearing, an additional hearing in accordance with Carroll County guidelines will be conducted with the County Commissioners in attendance upon a finding from the FAA on the final EA.*

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Ms. Jean Sinnott on March 20, 2009

Now that President Barack Obama has stated that he does not like for corporations to have their own private corporate jets, will there be the amount of jets still flying around to justify the expansion?

*The purpose of the proposed action is to provide sufficient airfield infrastructure at DMW to support the current and projected demand as noted in the FAA approved forecast of operations for the 20 year planning period presented in the 2007 Master Plan Update. The Master Plan states that the forecast for the airport was derived from previous forecasts as well as a review of fuel sales. In addition, trends in the aviation industry, both local and national, as well as the status of DMW as a reliever airport, and the potential effects of the nation's focus on improving air transportation security, were analyzed to develop the forecast.*

Carroll County Regional Airport  
Environmental Assessment  
Response to Comments  
Submitted by Nancy L. Frick on March 20, 2009

Enclosed please find a list of persons opposed to the airport expansion and the impact to the environment in our County. These 1,190 signatures have been presented to the County Commissioners and are part of the public record. No mention was made of their existence. They were collected at various functions and by door to door solicitation. Had we been allowed to approach the public in more heavily used areas there would have been many more.

**Response:**

*The referenced petitions were collected during the Master Plan study from 2006-2007, and submitted to the County Council for their considerations in making the local decision to proceed with the airport development. The concerns of the public (including air quality, endangered species, and noise) were assessed in the Environmental Assessment (EA) conducted in 2008-2009 and no significant environmental impacts were identified from the proposed project.*

Environmentally, I personally object to large aircraft now flying through my back yard. The Maryland Department of the Environment made a big show of concern, arriving on a Saturday when no large carriers were expected. He was extremely visible with the bus the size of Texas, containing no ladder, no testing materials. There was written permission granted by the neighborhood to inspect the roofs. This was not accomplished. No samples were taken of the black stained sidewalks. You will see by the enclosed photos there are no trees in proximity to cause this or mildew. We have feared its caused by a fuel spill or the practice there of. The gentlemen insulted the contractor saying they were inexpensive roofs, the oldest quite under 20 years old. He also insulted my intelligence after being associated with Naval Air Force over 40 years and seeing this type of thing. The determination was inconclusive. No proof existed.

**Response:**

*The above referenced visit by MDE was not conducted in association with the EA or in reference to the proposed projects discussed in the study.*

Another concern is the spillover pond which is runoff from our properties. It is lifeless!!! I must also mention impact of the loss of the trees adjacent to the airport. We were given a "fluff" inspection and assured trees would be replaced at the Bear Branch Nature Preserve miles away from the site. Madness! University of Maryland Carroll County Master Gardeners showed interest in the planting, but no contact was made. The opposition considers the survey less than adequate. Residents here are not impressed with starched shirts and pretty ties and know what they have stepped into.

**Response:**

*The prior obstruction clearing project referenced is not associated with projects evaluated in this EA. The County regulates tree removal through the Bureau of Resource Management and requires mitigation. In association with the EA, a Forest Stand Delineation (FSD) was conducted by Rettew Associates. An FSD and Forest Conservation Plan (FCP) are required for*

*the proposed action and will follow the requirements set forth in the Carroll County, Maryland Forest Conservation Technical Manual, Third Edition (May 2007). The FSD has been submitted to the County's Bureau of Resource Management for review and comment. Once concurrence has been received, a detailed FCP will be prepared to determine the forest retention, reforestation, and afforestation or off-site mitigation requirements for the proposed project.*

The last meeting was not well attended, they are uncomfortable with the snow job. The promised FAA rep. was not on board, fearing the opposition. If they don't hear it; perhaps it doesn't exist!! Remember you are allowing large aircraft to pass directly thru airspace with human beings closely below, sometimes less than 100 feet. They use my sandbox for a navigational tool.

**Response:**

*Carroll County followed regulations for the FAA public hearing as outlined in FAA Order 5050.4B, "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions" Chapter 4, Public Participation. The order states that a public hearing notice must inform the public at least 30-days before the date of the hearing and provide an opportunity for the public to give oral comments. Attendance from an FAA representative is not required by FAA Order 5050.4B. The hearing was conducted to offer the public an opportunity to comment on the draft EA document. The FAA will receive a copy of the hearing transcript as well as all written comments submitted throughout the comment period and responses to those comments. As noted during the March 9, 2009 hearing, an additional hearing in accordance with Carroll County guidelines will be conducted with the County Commissioners in attendance upon a finding from the FAA on the final EA.*