



American Rivers
Rivers Connect Us®

May 28, 2014

Charles K. McKnight, Jr.
Nations, Toman and McKnight, LLP
Suite 2330, Promenade
1230 Peachtree Street, NE
Atlanta, GA 30309

Dear Mr. McKnight:

I am writing in response to your April 29 letter to Bob Irvin, President of American Rivers, regarding the NEPA review process for the proposed expansion of the Paulding Northwest Atlanta Airport. Please find enclosed a copy of a letter commenting on the Notice of Intent and the potential scope of NEPA review of the expansion project. The comments were prepared by the Coosa River Basin Initiative (CRBI) and joined by American Rivers and Georgia River Network.

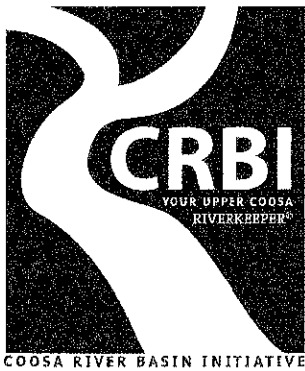
Other than being supportive of the efforts of local friends and allies like CRBI, it is unlikely that American Rivers will be active on the Paulding Airport issue, but feel free to contact me if you wish to discuss this further.

Thank you for contacting us about this important issue.

Sincerely,

Christopher E. Williams
Senior Vice President, Conservation
American Rivers

Attachment: CRBI comment letter



May 21, 2014

Atlanta Airports District Office
Lisa Favors
Environmental Program Manager
1701 Columbia Ave.
Suite 2-260
Atlanta, GA 30337-2747

*Informing and
empowering citizens to
protect, preserve and
restore North America's
most biologically unique
river system.*

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Dear Ms. Favors:

I am writing in response to the invitation for comments on Paulding County Northwest Atlanta Airport's application for a Part 139 Operating Certificate.

These comments are made on behalf of Coosa River Basin Initiative's board of directors and its more than 3,000 members, as well as American Rivers and Georgia River Network. CRBI's mission is to protect, preserve and restore North America's most biologically unique river system. Georgia River Network works to ensure a clean water legacy by engaging and empowering Georgians to protect, restore and enjoy our rivers. American Rivers works nationwide to protect our country's rivers.

Our area of concern includes the streams draining the Paulding County Airport as well as property that would be impacted by development associated with the airport's expansion. These streams include Bluffy, Pumpkinvine and Raccoon creeks.

These streams are home to federally protected fish species, including Cherokee and Etowah darters. These fish are found in the upper Coosa River basin and nowhere else in the world.

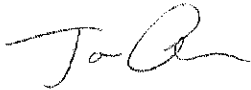
While we understand that the airport "expansion" will result in minimal land-disturbing activity, the Airport Authority plans identify adjacent county-owned property for extensive commercial, industrial and residential development directly linked to commercial aviation. The county currently advertises 1,000 acres that is available for airport-associated development and a master plan for the airport shows development to the east and west of the airport and north of the airport opposite US 278.

In developing an Environmental Assessment, we urge the Federal Aviation Administration to consider not only the immediate impacts associated with runway expansions and construction at the airport site itself, but also examine the impacts of these additional plans.

Cherokee and Etowah darters are highly susceptible to impacts from land disturbing activities and stormwater runoff. Raccoon Creek, which drains land slated for development that hinges on commercial aviation at the airport, is the site of an extensive restoration project to protect Cherokee and Etowah darters. The creek is considered the one Etowah tributary in Paulding County that has a chance of continuing to support strong populations of these fish.

Based on the potential impacts to adjacent streams and wetlands and other impacts associated with commercial service, we urge the FAA to conduct an Environmental Impact Statement rather than solely an Environmental Assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Cook".

Joe Cook
Advocacy & Communication Coordinator
Coosa River Basin Initiative

Chris Manganiello
Policy Director
Georgia River Network

Ben Emanuel
Associate Director, Clean Water Supply Program
American Rivers