

U.S. Department of Transportation  
Federal Aviation Administration  
Great Lakes Region  
Dakota-Minnesota Airports District Office

Finding of No Significant Impact/  
Record of Decision

For the Runway 14/32 Relocation/Extension and  
Associated Improvements at the  
Lake Elmo Airport  
Baytown and West Lakeland Townships, Minnesota

August 2018

## **I. Introduction**

The Federal Aviation Administration (FAA) prepared this Finding of No Significant Impact/Record of Decision (FONSI/ROD) for the proposed Runway 14/32 Relocation/Extension and Associated Improvements project at the Lake Elmo Airport (21D), operated by the Metropolitan Airports Commission (MAC). The attached Final Environmental Assessment (FEA), dated August 2018, has been prepared in accordance with the guidelines and requirements set forth by the Council on Environmental Quality (CEQ) and the FAA to implement the environmental review and disclosure provisions of the National Environmental Policy Act of 1969 (NEPA).

In accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*, and based on the evaluation in the FEA, there are no significant impacts associated with the proposed project. Therefore, a Federal Environmental Impact Statement (EIS) will not be prepared and a FONSI/ROD is being issued. This FONSI/ROD provides a review of the Proposed Action, mitigation requirements, and the basis for the FAA's finding.

Since the project was reviewed under a joint Federal Environmental Assessment/Minnesota Environmental Assessment Worksheet, this FONSI/ROD will only be used to fulfill Federal requirements under the National Environmental Policy Act. As the Responsible Government Unit (RGU) for the project under the Minnesota Environmental Policy Act (MEPA), the MAC has prepared separate Findings of Fact and Conclusions of Law and Order to fulfill the requirements of MEPA and Minnesota Rule 4410.1700.

## **II. Purpose and Need (Chapter 2 of FEA)**

The need for the proposed action is based on the following four deficiencies at the existing facility:

- 1) The existing runway and taxiway pavement is deteriorating and needs to be replaced.
- 2) Runway 14/32 has several incompatible land uses within its runway protection zones (RPZs), including a railroad and two public roads.
- 3) The existing pavement and airfield geometry, including runway lengths, aprons, taxiways, engine run-up pads, and other associated pavements, do not meet the needs of Airport users and aircraft.
- 4) The existing instrument approach procedures do not use the latest available navigational technology.

The purpose of the proposed action at 21D is to pursue the following three general infrastructure goals:

- 1) Address failing, end-of-life infrastructure;
- 2) Enhance safety for Airport users and neighbors; and
- 3) Improve facilities for the family of aircraft using the Airport.

The proposed action should address these deficiencies by achieving the above project goals and the following four supporting objectives:

- 1) Improve the runway and taxiway pavement condition;
- 2) Minimize incompatible land uses in the RPZs;
- 3) Meet runway length needs for users; and
- 4) Upgrade the instrument approach procedures.

### **III. Alternatives (Chapter 3 of the FEA)**

In accordance with NEPA and FAA Orders 1050.1F and 5050.4B, the FEA identified and evaluated all reasonable alternatives.

#### **Offsite Alternatives**

Relocate Airport. It is considered impractical to find a suitable site in the northeastern part of the metro area that would accommodate the based and transient general aviation users of 21D. The site would have to be in a rural area (such as the current site when it was acquired in 1949) with the ability to control existing and future land use around the Airport and maintain compatibility with Airport operations. The Airport currently comprises approximately 640 acres of land. The development of a new site to replace the Airport's size and function would likely require substantial impacts to one or more environmental resources such as wetlands, woodlands, surface waters, natural areas, farmlands, public parks, and existing urban infrastructure. Relocating the Airport may also result in incompatible land uses when considering FAA and MnDOT design standards and zoning criteria. Closing the Airport would mean abandoning substantial public and private investment in the Airport site and burden existing tenants by forcing them to relocate to the new airport. Furthermore, because of land acquisition and other costs associated with construction of a new airport, this alternative is not practicable or feasible. For these reasons, this alternative was not considered further.

Utilize Alternate Existing Airports. Under Minnesota Statutes 473.602, the MAC is invested with a legislative mandate to "promote the public welfare and national security; serve public interest, convenience, and necessity; promote air navigation and transportation, international, national, state, and local, in and through this state; promote the efficient, safe, and economical handling of air commerce; assure the inclusion of this

state in national and international programs of air transportation; and to those ends to develop the full potentialities of the metropolitan area in this state as an aviation center, and to correlate that area with all aviation facilities in the entire state so as to provide for the most economical and effective use of aeronautic facilities and service in that area.” In addition, under Minnesota Statutes 473.608, subd. 27, the MAC must “develop and implement a plan to divert the maximum feasible number of general aviation operations from Minneapolis-St. Paul International Airport (MSP) to those airports designated by the federal aviation administration as reliever airports for MSP.”

21D is an important part of the MAC’s general aviation reliever airports system and serves a vital function in helping MAC fulfill its legislative mandates. It is designated by FAA as a reliever airport for MSP and is one of six MAC system general aviation reliever airports in the Twin Cities metropolitan area. The six relievers include St. Paul Downtown (STP), Anoka County-Blaine (ANE), Flying Cloud (FCM), Crystal (MIC), Airlake (LVN), and Lake Elmo (21D). The purpose of these airports is to relieve congestion at MSP by providing infrastructure to accommodate the region’s general aviation needs. To preserve capacity at MSP, it is vital that corporate aviation services be provided at the key relievers (STP, ANE, and FCM). The remaining reliever airports (MIC, LVN, and 21D) complement the key relievers by accommodating personal, recreational, and some business aviation users within a specific service area. 21D is intended for use primarily by small propeller-driven aircraft. It is the only reliever airport in Washington County, providing the sole direct air connection to the northeast suburbs and outlying areas of the Twin Cities. Use of other reliever airports in lieu of improving 21D would not address the needs of the metropolitan airport system and would detract from each airport’s ability to serve its intended users and area.

The reliever airports were originally located to accommodate based and transient general aviation users in each airport’s service area. FAA Order 5090.3C, Field Formulation of the National Plan of Integrated Airport Systems (NPIAS), states that an airport should be included in the NPIAS if it is more than a 20-mile driving distance, or 30-minute drive time, from the nearest existing or proposed NPIAS airport. The drive times during peak traffic from 21D to all nine airports are 30 minutes or greater. Based on this metric, 21D not only serves a specific function as a reliever airport in MAC’s system of airports but also serves a specific geographic area that cannot be adequately served by another existing airport.

The FAA designates 21D as a Reliever Airport for MSP, which is defined under 49 U.S. Code §47102 as “an airport the Secretary designates to relieve congestion at a commercial service airport and to provide more general aviation access to the overall community.” The FAA further designates 21D as a Regional General Aviation Airport, which is defined by the 2012 FAA ASSET study as an airport that “supports regional economies by connecting communities to statewide and interstate markets.” Therefore,

21D plays important roles within the FAA airport system that cannot be substituted by another airport in the region.

The distances to other airports, the nature of the separate airport functions, and the service areas for each airport limit the feasibility of using one of the airports to off-set the services provided by another. Use of alternate existing airports in lieu of improving 21D would not meet the project purpose, because it would not: 1) address failing, end-of-life infrastructure; 2) enhance safety for Airport users and neighbors; or 3) improve facilities for the family of aircraft using the Airport. Use of alternate airports would not meet or reduce the needs of based and transient 21D users. For these reasons, this alternative was not considered further.

### **Alternatives Examined in Detail**

#### No Action Alternative.

The no-action alternative represents what would occur if the MAC were to maintain the existing airfield configuration and runway lengths at 21D, including reconstruction of the existing runway and taxiway pavements, to maintain safety and operational capacity. This alternative was eliminated from further consideration because it: 1) does not meet the runway length needs of Airport users; and 2) does not address existing incompatible land uses in both runway protection zones (RPZs) for Runway 14/32. This alternative is not recommended because it would not meet the purpose and need.

#### Primary Runway Alternative A: Extend Runway 04/22 to 3,200 feet.

Alternative A considered re-designating Runway 04/22 as the primary runway and Runway 14/32 as the crosswind runway, given there are fewer obstacles to extending Runway 04/22. This alternative would extend Runway 04/22 by 704 feet to the northeast, increasing the runway length from 2,496 to 3,200 feet. Runway 14/32 would be maintained at its existing length and configuration. This was identified as the preferred alternative by the previous Long Term Comprehensive Plan (LTCP) adopted in 2008. This alternative was eliminated from further consideration because it 1) does not meet the runway length needs of Airport users, 2) does not address existing incompatible land uses in both Runway 14/32 RPZs, and 3) does not provide optimal wind coverage on the longer (primary) runway.

#### Primary Runway Alternative B: Relocate Runway 14/32 700 feet & Extend to 3,600 feet.

Alternative B would relocate Runway 14/32 by 700 feet to the northeast and extend the runway by 751 feet to the southeast, increasing the runway length from 2,849 to 3,600 feet. Runway 4/22 would also be extended 254 feet to the northeast for an overall length of 2,750 feet. This was identified as the preferred alternative in the Draft LTCP. Based on public comments received in response to the Draft LTCP, a modified version of this alternative was developed and recommended as the Preferred Alternative B1.

Primary Runway Alternative B2: Relocate Runway 14/32 by 615 feet, Extend to 3,500 feet, and Displace Runway 32 Threshold by 300 feet.

Alternative B2 would displace the Runway 32 threshold by 300 feet and limit landing distance available (LDA) to 3,200 feet for Runway 32 landings. The intent of this alternative is to explore potential reduction in aircraft noise experienced by those below the flight path. The 3,200-foot LDA would meet the average design aircraft landing length needs between 90% and 100% useful load. This alternative would maintain the proposed 3,500-foot length for all other operations on Runway 14/32, and is identical to Alternative B1 in every other respect. Alternative B2 was discarded because it does not conform to FAA airport design standards for implementing a displaced threshold.

Primary Runway Alternative C: Relocate Runway 14/32 700 feet & Extend to 3,900 feet.

Alternative C would relocate Runway 14/32 by 700 feet to the northeast and extend the runway to 3,900 feet by placing the Runway 14 end at the existing north side taxiway. Runway 4/22 would be extended 254 feet to the northeast for an overall length of 2,750 feet. This alternative was eliminated from further consideration because 1) it extends the runway beyond the length recommended in the facility requirements analysis for the fleet at 21D, and 2) it does not address existing incompatible land uses in the Runway 14 RPZ.

Primary Runway Alternative D: Relocate Runway 14/32 308 feet & Extend to 3,500 feet.

Alternative D would further reduce the northeasterly shift of Runway 14/32 from the 615 feet proposed by Alternative B1 to 308 feet. This is the minimum runway shift required to move the Runway 14 RPZ onto Airport property. The intent of this alternative is to reduce the change in aircraft flight patterns and associated noise southeast of the Airport when compared with Alternative B1. This alternative was eliminated from further consideration because it would prevent a 30th Street North re-alignment alternative that avoids land acquisition and minimizes impacts to wetlands south of the Airport.

Primary Runway Alternative E: Extend Existing Runway 14/32 to 3,500 feet.

Alternative E considers extending existing Runway 14/32 by 651 feet to the southeast. This alternative was eliminated from further consideration because 1) it would not address existing incompatible land uses in both Runway 14/32 RPZs; 2) it would prevent a 30th Street North re-alignment alternative that avoids land acquisition and minimizes impacts to wetlands south of the Airport; and 3) it would increase wildlife hazards for approaching and departing aircraft by moving the Runway 32 threshold into a large wetland area. This alternative also would not meet FAA design standards intended to promote the safety of aircraft operations, as it would not provide a standard runway object free area, standard runway-to-parallel-taxiway separation, and a clear 14 C.F.R. Part 77 transitional surface, all of which are provided by Alternatives B, B1, B2, C, and D.

### 30th Street North Alternatives.

Primary runway Alternatives B and B1 are in direct conflict with the existing alignment of 30th Street North, as the street is within the areas that must be protected for runway and taxiway safety purposes. The implications of realigning 30th Street North was a major community concern. As a result, the 30th Street North alternatives evaluation process utilized criteria that flow directly from concerns articulated by residents and community engagement panel (CEP) members as part of the stakeholder engagement process.

#### 30<sup>th</sup> Street North Alternative 1: New T-Intersection with Stop Sign on 30<sup>th</sup> Street.

This alternative would realign 30th Street North southeast of the relocated Runway 32 RPZ such that it intersects at a new T-intersection with Neal Avenue North approximately ¼-mile south of the existing intersection. Through traffic on 30th Street North would experience two additional turning movements in each direction and an increase in total travel distance of about 1,800 feet. In addition, 30th Street through traffic would be introduced onto the segment of Neal Avenue between the intersections. Local trips between Manning Avenue and residences south of the new intersection would be removed from this segment of Neal Avenue and benefit from a reduced travel distance. This alternative was withdrawn in response to public comments received in response to the Draft LTCP.

#### 30<sup>th</sup> Street North Alternative 2: New T-Intersection with Stop Sign on Neal Avenue.

This alternative is a modified version of Alternative 1 that continues the curve of 30<sup>th</sup> Street North such that the roadway merges with the existing Neal Avenue North alignment and allows continuous movement between the existing intersections of 30<sup>th</sup> Street with Manning Avenue and Neal Avenue. Through traffic on 30th Street would experience one additional turning movement in each direction and an increase in total travel distance of about 1,500 feet. Access to existing Neal Avenue southeast of the Airport would be maintained by constructing a new T-intersection approximately ¼-mile south of the existing intersection with 30<sup>th</sup> Street. The main difference from Alternative 1 is that a new stop sign would be installed on the Neal Avenue approach from the south, rather than on the 30<sup>th</sup> Street approach from the west. Impacts to local traffic flowing between Manning Avenue and residences southeast of the Airport would be the same as under Alternative 1.

During the initial LTCP public comment period, there was significant public opposition to Alternatives 1 and 2 because of increased travel distances, additional turning movements, new vehicle trips on Neal Avenue North, and proximity of the realigned 30<sup>th</sup> Street North to residences southeast of the Airport. In addition, these alternatives did not consider the adverse effects of grade changes and an isolated wetland in the extreme southwest corner of Airport property, impacts that Alternatives 3, 4A, and 4B avoid. For these reasons, Alternatives 1 and 2 were not considered further.

30<sup>th</sup> Street North Alternative 4A: Modified Hybrid with New Roundabout.

This alternative is a modified hybrid version of Alternatives 2 and 3, which would shift the Final LTCP preferred alternative 30<sup>th</sup> Street North alignment to the northwest to introduce a longer straight section, and would realign a portion of Neal Avenue North to the northwest. These refinements would allow for construction of a roundabout at the intersection of realigned 30<sup>th</sup> Street N and Neal Avenue North approximately 600 feet southwest of the existing intersection. A secondary roadway would be constructed to the immediate east of the intersection to provide continued access for two residential properties located immediately southeast of the existing 30<sup>th</sup> and Neal intersection. This alternative would increase the radii of the new horizontal curves on 30<sup>th</sup>; minimize the number of vehicular conflict points at the intersection of 30<sup>th</sup> and Neal by replacing the four-way stop with a roundabout; require a narrower field of vision for vehicles approaching the intersection; reduce travel time increases in all directions; and allow continuous through traffic on 30<sup>th</sup>, as well as on Neal south of 30<sup>th</sup>. All of this would be accomplished while avoiding introduction of new vehicle trips on Neal Avenue, as intended by the Final LTCP preferred alternative.

30<sup>th</sup> Street North Alternative 4B: Modified Hybrid with New T-Intersection.

This alternative is identical to Alternative 4A, except that the proposed roundabout would be replaced by a T-intersection. The purpose of this minor design change would be to decrease traffic delay on 30<sup>th</sup> Street North by eliminating the need to navigate the roundabout.

At CEP meetings, there was not a consensus among the panel members that the adjustments made under Alternatives 4A and 4B would be preferable to the design concept represented by Alternative 3. Because Alternatives 4A and 4B would be more expensive to construct than Alternative 3, it was determined that the additional investment required by these alternatives would not be justified based on CEP input. For these reasons, Alternatives 4A and 4B were not considered further.

#### **IV. Proposed Action**

Preferred Alternative B1: Relocate Runway 14/32 by 615 feet and Extend to 3,500 feet

Alternative B1 would relocate Runway 14/32 by 615 feet to the northeast and extend the runway by 651 feet to the southeast, increasing the runway length from 2,849 to 3,500 feet. This alternative also designates Runway 14/32 as a “utility” runway for aircraft less than 12,500 pounds, which reduces the size of the RPZs. This concept was developed as a modified version of Alternative B to 1) move the Runway 32 threshold further from residential neighborhoods to the southeast, and 2) allow for a modified 30<sup>th</sup> Street North realignment concept that ties in with the existing intersection with Neal Avenue North. As under Alternative B, the Alternative B1 Runway 4/22 would be extended 254 feet to the northeast for an overall length of 2,750 feet.

The EA explains in Chapter 2 that primary runway length needs were first evaluated utilizing FAA guidance provided in AC 150/5325-4B, Chapter 2, for small, propeller-driven aircraft weighing less than 12,500 pounds and with fewer than 10 passenger seats. The AC divides the fewer than 10 passenger seat category into two fleet subcategories, namely, “95 percent of fleet” or “100 percent of fleet”. Based on the AC’s definitions of each fleet subcategory, the 100 percent of fleet subcategory is most applicable at Lake Elmo Airport. The AC identifies a recommended primary runway length of 3,300 feet for the 95 percent of fleet subcategory and a recommended primary runway length of 3,900 feet for the 100 percent of fleet subcategory. Although the AC 150/5325-4B method identifies a recommended runway length of 3,900 feet for the 100 percent of fleet subcategory, the proposed 3,500-foot runway length would accommodate user needs in most scenarios and would provide a substantial safety and operational improvement over the current primary runway length of 2,849 feet. The method used to justify the proposed runway length is based on applying FAA’s guidance while taking into account limiting factors in the vicinity of the Airport to: 1) provide Runway Protection Zones (RPZs) that are clear of incompatible land uses; 2) allow realignment of 30th Street North such that the existing four-way intersection of 30th Street and Neal Avenue can be maintained; and 3) maximize the distance of the proposed runway ends from adjacent private properties. In all cases, the pilot is in command of his or her aircraft and must make the final determination on whether his or her aircraft may be safely operated within the available runway length.

*30<sup>th</sup> Street North Alternative 3: Final LTCP Preferred Alternative.*

This alternative maintains the existing intersection at 30th Street North and Neal Avenue North by tightening the curves around the relocated Runway 32 RPZ, preserving the continuity necessary for 30<sup>th</sup> Street North to fulfill its role as a major collector roadway. Because of the tighter curves, the design speed for the relocated roadway would be reduced from the design speed of 45 miles per hour under Alternatives 1 and 2 to a design speed of 30 miles per hour. The existing design speed for 30<sup>th</sup> Street North is 55 miles per hour. This alternative does not introduce any new intersections or turning movements for through traffic on 30th Street, and no new traffic is introduced onto Neal Avenue. This alignment does not allow for the relocated Runway 14/32 to be extended to its recommended length of 3,600 feet as originally proposed by Alternative B, and was designed specifically for a shortened 3,500-foot runway as proposed by Alternative B1.

*Crosswind Runway.*

One alternative was considered for extending the crosswind Runway 04/22 to the 2,750-foot length. This alternative would extend the runway by 254 feet to the northeast. Extending the runway to the northeast was considered preferable to extending to the southwest, as both RPZs would remain on Airport property. Other than no action, there

are no alternatives for meeting crosswind runway length requirements that satisfy the basic threshold criteria of being reasonable, achievable, and satisfying the project purpose as identified by FAA Order 1050.1F.

#### Instrument Approach.

Only one alternative was considered for upgrading the instrument approach procedures. This alternative would establish a non-precision GPS-based instrument approach procedure with not less than one-mile visibility minimums to the Runway 14 end, and upgrade the existing Runway 04 approach procedure to an RNAV (GPS) type. A non-precision GPS-based procedure to Runway 22 would be included as well. This alternative proposes installation of runway edge lights, precision approach path indicator (PAPI) lights, and runway end identifier lights (REIL) on Runway 04/22 to allow better identification of the runway environment by pilots during Instrument Flight Rule (IFR) conditions. The instrument approach alternative to establish non-precision GPS-based instrument approach procedures to all runway ends not already equipped would improve Airport safety by allowing pilots to fly a stabilized straight-in approach to the most viable runway end during inclement weather.

The Proposed Action includes:

- Relocate Runway 14/32 by shifting 615 feet to the northeast and extend to 3,500 feet, including grading, clearing, and runway lighting.
- Extinguish existing prescriptive easement for 30<sup>th</sup> Street North and seek, as appropriate, a land release for non-aeronautical use from the FAA to allow realignment of 30<sup>th</sup> Street North around the new Runway 32 RPZ to reconnect with the existing Neal Avenue North intersection.
- Relocate the Airport perimeter fence to reflect the new Runway 32 RPZ.
- Remove the existing north side taxiway, compass calibration pad, and construct a new cross-field taxiway to serve the new Runway 14 end, including taxiway lighting and/or reflectors.
- Convert existing Runway 14/32 to a partial parallel taxiway and remove the portion of the existing parallel taxiway south of the Runway 04 threshold.
- Reconstruct Runway 4/22 and extend to 2,750 feet, including necessary lighting and taxiway connectors.
- Construct other taxiways and engine run-up pads as needed to support the relocated Runway 14/32 and extended Runway 04/22, including connector taxiways and a full-length parallel taxiway on the north side of the relocated Runway 14/32, and install taxiway lighting and/or reflectors.
- Relocate the compass calibration pad adjacent to the new partial parallel taxiway (converted Runway 14/32).
- Establish non-precision GPS-based instrument approach procedures to all runway ends not already equipped.

- Provide Runway 14/32 lighting systems with the relocated runway.
- Install medium intensity runway edge lights (MIRL) on Runway 04/22; PAPIs on the Runway 04, 14, and 22 ends; and REIL on each end of Runway 04/22.
- Remove approximately 20 acres of on-Airport trees and individual off-Airport trees as necessary to clear trees that penetrate FAA Threshold Siting Surfaces (TSS)/Part 77 approach and transitional surfaces.
- Install obstruction lighting on fixed base operator (FBO) and hangar buildings in the *United States Standard for Terminal Instrument Procedures* (TERPS) departure surface areas beyond Runway 04, 14, and 22 ends.
- Construct on-Airport access road connecting the north and west building areas.
- Voluntarily explore creation of Rusty Patched Bumble Bee/pollinator habitat on Airport property southwest of proposed 30<sup>th</sup> Street North realignment.

Project construction is targeted to begin in 2019 and would occur in annual phases over the course of approximately five years.

#### **V. Environmental Impact Categories of the Proposed Action (Chapter 5 FEA)**

Environmental impact categories identified in FAA Orders 1050.1F and 5050.4B were evaluated in the FEA. Environmental consequences and the affected environment of the preferred alternative and no action alternative are included in Chapters 4 and 5 of the FEA.

Given the location and nature of the Proposed Action, impacts to the following environmental resources and impact categories do not occur:

- Coastal Resources
- Department of Transportation 4(f)

The FEA discusses the environmental consequences of the Proposed Action, which are described in the following impact categories:

#### **Air Quality:**

Operational emissions were calculated for the 2016 baseline (existing conditions) and 2025 forecast (preferred alternative and no-action alternative) scenarios. Emissions modelling estimates an overall decrease in pollutant emissions between the 2016 baseline estimate and 2025 forecast aircraft operations.

The projected changes in operational emissions associated with the proposed action would not exceed the *de-minimis* thresholds contained in the FAA's Aviation Emissions and Air Quality Handbook Version 3, Update 1 (January 2015), as expressed in annual tons. Moreover, estimated increases in vehicle emissions associated with lengthening 30th Street North do not exceed the *de minimis* thresholds established by the FAA Aviation Emissions and Air Quality Handbook. Therefore, there are no significant air quality impacts for the proposed action.

Constructions emissions modelling revealed that total emissions associated with all years of construction are not expected to exceed the *de-minimis* thresholds for those pollutants with *de minimis* thresholds listed in the FAA's Aviation Emissions and Air Quality Handbook Version 3, Update 1 (January 2015), as expressed in annual tons. Increased emissions associated with project construction will be offset through use of voluntary best management practices (BMPs) such as engine idling restrictions and maintenance requirements, and other control strategies identified in the *U.S. Environmental Protection Agency Diesel Emission Restriction Checklist*. Therefore, there are no significant air quality impacts associated with the proposed action. For additional information, see section 5.1.1 of the FEA.

**Biological Resources (including Fish, Wildlife and Plants):**

Biological resources potentially affected by the preferred alternative are related to vegetation management and listed species. The proposed action will require the removal of approximately 20 acres of trees on Airport property for construction of the runway and clearance of associated approach and departure surfaces. Approximately 12 off-Airport trees would need to be removed in the approaches to the crosswind runway, and no off-Airport trees would need to be removed in the approaches to the primary runway. The Airport will continue to use vegetation management practices, best management practices, and standard erosion control practices.

There are six federally listed species with habitat in Washington County. Four of these species are freshwater mussels with habitat in either the Mississippi or the St. Croix Rivers, and would not be affected by the proposed action. The FAA made a no-effect determination for these four freshwater mussels on November 3, 2017. See Appendix E. The other two species are the Northern Long Eared Bat and the Rusty Patched Bumble Bee.

The Northern Long Eared Bat (NLEB) is federally listed as threatened and has potential habitat within the project area. The USFWS concurred with a may affect, not likely to adversely affect determination on December 7, 2017 by utilizing recommended avoidance and minimization measures.

The Rusty Patched Bumble Bee (RPBB) is federally listed as endangered in the project area. The USFWS concurred with a may affect not likely to adversely affect determination for this species on December 7, 2017. The USFWS suggested that the MAC consider managing a portion of Airport property to encourage native flowering species that would provide nectar and pollen sources for RPBB and other pollinator populations that may be in the area. In response to this suggestion, the MAC is exploring creation of tall grass prairie in a 27.5-acre area south of the planned realignment of 30<sup>th</sup> Street North. The prairie would be designed as foraging habitat for the RPBB and other pollinators.

The Blanding's Turtle, a state listed species, may be present in the action area as well. The proposed project may potentially disrupt its habitat because of dewatering, excavation, filling, or other construction activities. Avoidance and minimization measures will be implemented during project construction to help protect this species.

Based on the information above, there are no significant impacts to biological resources associated with the proposed action.

**Climate:**

The proposed action would result in temporary increases in direct on-site CO<sub>2</sub>e emissions attributable to construction equipment. Total construction CO<sub>2</sub>e emissions are estimated at approximately 12,400 tons over a five-year period. On-site operational CO<sub>2</sub>e emissions attributable to aircraft operations in 2025 under the preferred alternative are expected to decrease by approximately 15 tons per year, from approximately 667 tons per year in 2016 to 652 tons per year in 2025. Aircraft operations are expected to slightly increase emissions in the years after 2025 compared to the no-action alternative. In its January 2017 biennial GHG emissions report to the state legislature, the Minnesota Pollution Control Agency (MPCA) estimated statewide CO<sub>2</sub>e emissions in 2014 at 158.3 million tons, while the U.S. Environmental Protection Agency (EPA) estimated nationwide CO<sub>2</sub>e emissions in 2014 at 6,870 million tons. Based on these estimates of CO<sub>2</sub>e emissions, the potential for the preferred alternative to affect future climate conditions is very limited when considering the amount of CO<sub>2</sub>e emissions attributable to other sources in Minnesota and throughout the United States.

Based on the above estimates of marginal changes in CO<sub>2</sub>e emissions, there are no significant climate impacts with the proposed action.

**Farmlands:**

The Natural Resources Conservation Service (NRCS) determined that 42.28 acres of farmland would be directly converted by the proposed action. This represents approximately one sixth of farmland currently in production on Airport property. Nearly all 42.28 acres are considered prime and unique farmland. Based on NRCS farmland evaluation criteria, the farmland to be converted because of the preferred alternative has a total value of 136 points, which does not exceed the 160-point threshold for additional consideration and analysis of farmland protection or alternative sites. Based on the information above, there are no significant impacts to farmlands associated with the proposed action.

**Hazardous Materials, Solid Waste, and Pollution Prevention:**

No hazardous materials sites were identified in the project area that could be considered a pollutant source requiring further evaluation or mitigation. The preferred alternative would produce construction debris such as dirt, concrete, and asphalt, and

maintenance activities for the new airside facilities would produce other sources of solid waste. Construction materials and other solid waste will be disposed of at a commercial landfill capable of handling disposal and in accordance with applicable laws and regulations. Based on this information, there are no hazardous materials or solid waste impacts expected for the proposed action.

**Historical, Architectural, Archeological and Cultural Resources:**

Based on historic and archeological field surveys, there are no impacts to historical/architectural or archeological resources associated with the proposed action. The FAA determined that a Section 106 finding of No Historic Properties Affected was applicable for the preferred alternative, and submitted this finding to the State Historic Preservation Office (SHPO), the Lower Sioux Indian Community Tribal Historic Preservation Office (THPO), the Upper Sioux Indian Community THPO, the Prairie Island Indian Community THPO, the Mille Lacs Band of Ojibwe THPO, and the Shakopee Mdewakanton Sioux Community THPO, on October 20, 2017. The SHPO concurred in the FAA finding in a letter dated December 28, 2017. The FAA attempted to achieve concurrence from all of the THPOs, but none of the THPOs responded or objected to the proposed finding, so concurrence was therefore assumed.

If cultural resource or human remains are discovered during construction, the Airport will notify the SHPO, the above-mentioned THPOs, and the FAA Dakota-Minnesota Airports District Office (ADO). The Airport sponsor will protect the area until concerns have been appropriately addressed and the Airport will comply with the National Historic Preservation Act, the Native American Graves Protection and Repatriation Act, and the Archaeological Resources Protection Act, as appropriate.

Based on the information above, there are no significant impacts to historical/architectural or archeological resources associated with the proposed action.

**Land Use:**

Because the preferred alternative would not substantially alter the VFR traffic pattern airspace, impacts to surrounding land uses are minimal.

Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board (JAZB) under Minnesota Statutes Chapter 360. Members of the JAZB are expected to include representatives from the City of Lake Elmo, Baytown Township, West Lakeland Township, Washington County, and any other local government jurisdiction affected by the proposed zoning ordinance. The process will consider public input as part of developing an airport zoning ordinance. This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state's Model Zoning Ordinance.

Effects to existing and planned neighboring land uses were identified in Chapter 3, *Alternatives*, for the no-action and preferred alternative using the Model State Safety

Zones A and B promulgated under Minnesota Administrative Rules 8800.2400 as a guide. These zones are not currently in effect at the Airport. Safety Zone A typically prevents erection of new structures, and Safety Zone B typically prevents small lot residential development using density standards. This analysis determined that, under the proposed action, there would be three houses in Model Safety Zone A and ten houses in Model Safety Zone B for Runway 14/32, and two houses in Model Safety Zone A and ten houses in Model Safety Zone B for Runway 04/22.

For roadway reconstruction, the proposed realignment of 30<sup>th</sup> Street North will increase the average travel time along 30<sup>th</sup> Street North by approximately 46 seconds in either direction. This incremental increase in travel time would not place an undue burden on local roadway users. Based on discussion with the Bayport Fire Department, the primary effect on emergency response associated with the realignment will be increasing the time necessary to access fire hydrants west of Manning Avenue when responding to fires east of Manning Avenue. Because multiple jurisdictions respond to emergencies in the area under a mutual aid agreement and numerous firefighting vehicles would be present in the event of a fire, the increase in travel time is not expected to have an adverse impact on emergency response.

Relocation of 30<sup>th</sup> Street North will require approval from FAA as a land release of dedicated Airport property for non-aeronautical use. The proposed realignment of 30<sup>th</sup> Street North will benefit and be compatible with the needs of civil aviation at the Airport by removing incompatible land uses from the RPZs on both ends of the runway (Manning Avenue and railroad removed from the Runway 14 RPZ, 30<sup>th</sup> Street North removed from the Runway 32 RPZ). See Appendix I.

To address possible wildlife concerns, a certified wildlife biologist from Mead & Hunt conducted a site visit in October 2017 to observe and characterize wildlife attractants at and surrounding the Airport. The site visit report indicates that the proposed project would not result in any new hazardous wildlife concerns at the Airport. In a letter dated January 3, 2018, a USDA wildlife biologist states “the proposed changes to the existing airport layout are unlikely to increase the wildlife hazards present at 21D” and “would have little effect on current hazardous wildlife use of the airport and surrounding area.”

Land use impacts associated with the proposed action will not be significant based on results of the analysis described above and in the FEA.

#### **Natural Resources and Energy Supply:**

Consumption of energy and natural resources during the construction phase of the proposed action would consist mainly of construction machinery fuel and construction materials. This consumption will not exceed locally available supplies, and some construction materials may be recyclable.

Operation and maintenance of the proposed improvements are expected to require minor increases in energy and natural resource demand. No significant increases in aircraft or ground vehicle fuel usage are expected. In addition, the minor increases in utility demand for airfield lighting and maintenance equipment are not expected to have a negative impact on local energy or natural resource supplies. The existing incandescent airfield lighting systems currently require approximately 35,000-kilowatt hours (kWh) of electricity to operate annually. If replaced with similar incandescent systems, and if the lighting systems to be added by the proposed action are incandescent systems, the annual electricity requirements are expected to increase by more than two and a half times to approximately 128,000 kWh per year. However, energy-efficient light-emitting diode (LED) fixtures were recently approved by FAA for all planned airfield lighting systems considered by the proposed action. If LED fixtures were to be installed instead of incandescent fixtures for all proposed airfield lighting systems, the annual electricity needs are expected to decrease by five percent to approximately 33,000 kWh per year. This difference in electricity consumption will inform consideration of specific light systems at the time of project design.

In a letter dated February 27, 2017, the EPA encouraged the proposed project to use energy efficient lighting systems, sustainable building materials, and renewable energy sources. In recent decades, new airfield lighting options have emerged that use light-emitting diode (LED) light fixtures. The use of LED light fixtures provides for considerable energy and maintenance savings because of the lower wattage and increased lamp life over standard incandescent lamped fixtures. LED lighting systems would be considered during project design.

The EPA letter also recommended that pavement and structural materials be reclaimed for future use for this project or elsewhere. The MAC will identify design best management practices such as recycling (crushing) pavement for use as base-course and other practices to reduce natural resource impacts.

The required quantities of natural resources and energy supplies required by the proposed action would not exceed available natural resources or energy supplies.

#### **Noise and Compatible Land Use:**

Noise modeling utilizing the Aviation Environmental Design Tool (AEDT) was utilized for the proposed action. The 65 yearly day-night average sound level (DNL) contour is currently (2016) contained entirely on Airport property. Similarly, under the 2025 proposed action, the 65 DNL contour will be contained entirely on Airport property. As a result, there will be no significant aircraft noise impacts under the proposed action. Noise contours were developed for the 60 DNL for informational purposes only, as FAA does not consider the 60 DNL significant. The 60 DNL contour extends west of Airport

property in the baseline 2016 and no action 2025 scenarios, but is contained entirely on Airport property in the proposed action 2025 scenario.

Construction equipment noise would be temporary and would be minimized and mitigated through implementation of appropriate construction practices specified in FAA Advisory Circular (AC) 150/5370-10E, *Standards for Specifying Construction of Airports*. The MAC will also include contract provisions requiring construction noise mitigation. As a result, there will be no significant construction noise impacts for the proposed action.

**Socioeconomics, Environmental Justice, & Children’s Environmental Health & Safety:**

The project would occur entirely on existing Airport property. The scale and nature of the project is not expected to result in any direct socioeconomic impacts, such as shifts in patterns of population movement or growth, public service demands, or changes in business and economic activities. The proposed action includes extinguishing the prescriptive easement for 30th Street North and seeking, as appropriate, a land release for non-aeronautical use from the FAA to allow realignment of 30th Street North near the new Runway 32 RPZ to reconnect with the existing Neal Avenue North intersection. Realignment of the township collector road 30<sup>th</sup> Street North and conveyance of an appropriate property interest to the appropriate local government authority/authorities will be determined following completion of this EA/EAW. Marginal increases in aircraft activity resulting from the proposed action would not produce any significant induced or secondary socioeconomic impacts.

There are no low-income or minority populations near the project, and therefore no environmental justice impacts associated with the proposed action. No potential disproportionate health or safety risks to children are expected.

**Visual Effects:**

The proposed action would move the Runway 14/32 MIRL, PAPI, and REIL systems closer to residential areas southeast of the Airport. The new MIRL, PAPI, and REIL systems on either end of Runway 04/22 would be a similar distance from residences northeast and southwest of the Airport. These residential areas are currently shielded from airport light emissions because they are more than a half mile from the existing runway ends, with mature trees in between. The distance from the Runway 32 end to the Airport property line, when measured along the extended runway centerline, would be reduced from approximately 2,400 feet to 1,900 feet under the proposed action. The distance from the Runway 22 end to the Airport property line would be reduced from 2,250 feet to 2,000 feet.

Tree removal associated with the project will eliminate an existing visual screen between the runways and residential areas southeast and northeast of the Airport.

However, lighting impacts from the MIRL and PAPI will likely be minimal given their location and steady illumination.

Under the proposed action, the runway and taxiway edge lights would be preset to low intensity and would only increase in intensity when in use, while the REILs and PAPIs would not be illuminated at all when not in use. Based on frequency of IFR conditions and nighttime operations at the Airport, less than 15 percent of aircraft operations (approximately 4,000 annual operations or less) are expected to occur during nighttime or in inclement weather conditions. Unnecessary light can be further reduced by illuminating the REIL systems only when the pilots activate the highest intensity setting. As high intensity lighting at night can be disorienting for pilots, the high-intensity setting is typically used by pilots only to aid in initially locating an airport. After the pilot has positively identified the Airport, it is common to reduce the lighting intensity to complete the approach and landing.

The proposed action also includes installation of obstruction lighting on top of approximately a dozen on-Airport structures that would penetrate the departure TSS beyond the Runway 04, 14, and 22 ends. These would be steady-burning red lights to increase conspicuity from the air during nighttime. Given their performance characteristics and distance from light-sensitive receptors, these lights are not expected to create annoyance or interfere with normal activities.

Based on the information above, there are no significant visual effects associated with the proposed action.

**Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers):**

Based on the wetland boundary data collected during the delineation, there would be approximately 2.36 acres of direct wetland impact associated with the preferred alternative. Of these 2.36 acres, 1.85 are associated with the primary runway and associated taxiways, 0.12 acres are associated with the realignment of 30th Street North, 0.38 acres are associated with the crosswind runway extension, and 0.01 acres are associated with the planned access road. The total 2.36-acre impact is divided between about 0.06 seasonally flooded basin (Type 1), 1.66 acre of fresh wet meadow (Type 2), and 0.65 acres of shallow marsh (Type 3) wetland.

Wetland mitigation will be required as a condition of a permit under Section 404 of the Federal Clean Water Act. The mitigation ratios are determined by Washington County's location within the <50% wetland loss area of the state, which establishes a 2.5:1 base ratio for in-kind mitigation and can be reduced to 2:1 if mitigated within Bank Service Area 6.

The MAC will consider wetland banking opportunities during the permitting process. Purchase of wetland bank credits would occur after the exact wetland impact area is determined during design engineering.

Although there would be tree removal in wetlands not directly affected by the project, tree removal would not change the wetland types identified by the wetland delineations completed for the project. Furthermore, the trees would be removed during winter and would not result in a discharge of dredged and fill material to any wetlands, and therefore would not alter the original cross-section of the wetlands. As required under WCA, the MAC will seek to avoid any degradation to the quality or biodiversity of the wetlands. If project permitting authorities determine the need for mitigation related to tree removal in wetlands, any necessary mitigation would be incorporated into the required compensatory mitigation plan as a condition of the permit.

The VBWD rules and regulations require that upland buffer vegetation be provided around wetlands, streams, and lakes. For wetlands, VBWD Rule 4, Standard 13a states, "A minimum 25-foot vegetative buffer strip immediately adjacent and contiguous to the delineated wetland boundary or the Ordinary High Water Level (OHW), whichever is greater in elevation, shall be provided for all permitted activities." This buffer requirement can be met within the estimated areas of wetland impact identified in the EA/EAW. All vegetative buffer requirements listed in the VBWD rules and regulations will be incorporated into the project during final design and permitting.

Because the 0.06-acre portion of wetland impacts south of 30th Street North are associated with a water body identified in the MDNR Public Waters Inventory (PWI), a MDNR Public Waters Permit may be required. However, no fill material will be placed below the OHW of this public water.

The preferred alternative will add approximately 850,000 square feet of impervious surface associated with construction of the runways, taxiways, and roads. However, approximately 300,000 square feet of existing impervious surface will also be removed, for a net increase of 550,000 square feet (12.6 acres) of impervious surface.

The Airport is located within and subject to the stormwater management requirements of the VBWD, Baytown Township, and West Lakeland Township. Both townships are subject to the VBWD stormwater requirements, while West Lakeland Township is an MS4 permit holder and therefore is also subject to National Pollutant Discharge Elimination System (NPDES) Phase II permitting requirements and regulations under the NPDES MS4 permit. MS4 permits are designed to reduce the amount of sediment and pollution that enters surface and ground water from storm sewer systems of conveyance to the maximum extent possible. Under both the VBWD requirements and the NPDES Phase II requirements, post-construction stormwater management is required for new development and redevelopment projects that replace vegetation or

other pervious surfaces with one or more acres of cumulative impervious surfaces. Because the proposed action exceeds this threshold, post construction stormwater management measures will be required to meet VBWD requirements, and the NPDES Phase II requirements.

To meet stormwater requirements, the site development plan will include both structural and non-structural best management practices (BMPs). These BMPs will manage and treat runoff, and control erosion and exposed soils. Final treatment methods will be determined upon final design.

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) were reviewed to determine if the proposed action would result in development within a 100-year floodplain. The FIRMs indicate a potential flood hazard zone within the preferred alternative area of ground disturbance south of 30th Street North. The total wetland fill footprint in this area is estimated to be 0.06 acre. Based on preliminary design profiles for the proposed realigned segment of 30<sup>th</sup> Street North, approximately 1,120 cubic yards (CY) of earthen fill would be placed within the floodplain boundary mapped by VBWD and below the 1%-Annual-Chance Flood Elevation estimated by VBWD. The estimated existing flood storage volume of the West Lakeland Township Ponds, using 919.2 feet as the 100-year flood elevation, is 286,650 CY. Based on comparison of the 1,120 CY fill volume to the existing 286,650 CY existing flood storage volume, the 100-year flood level is not expected to rise by more than 0.1 foot as result of the realignment of 30<sup>th</sup> Street North. Based on the above, the estimated net loss of floodplain storage is insignificant when considering the flood volumes associated with a 100-year event, and there would be no notable adverse impacts on natural and beneficial floodplain values associated with preferred alternative. The watershed district permit will be acquired by the MAC prior to construction and will fulfill permitting requirements related to floodplains.

The preferred alternative does not have potential for impacts to water bodies listed as impaired under Section 303(d) of the Clean Water Act and will not contribute to the listing of any waterbodies as impaired. The preferred alternative will not substantially diminish natural and beneficial surface water or groundwater resource values, and no MDNR public waters or wild and scenic rivers would be affected. Based on the information above, the established FAA thresholds of significance under NEPA, and the significance thresholds under MEPA, there are no significant impacts to water resources associated with the preferred alternative or no-action alternative.

#### **Cumulative Impacts and Cumulative Potential Effects:**

Information was gathered on construction and other development projects that have recently been completed in addition to those that under NEPA may reasonably be

expected in the future or under MEPA are actually planned. These actions include the following:

- An estimated 1,720 parcels have developed within two miles of proposed runway ends since 1964.
- Extension of municipal water and sanitary sewer systems to the area west of Airport occurred within the last ten years and will contribute to continued urban development of the City of Lake Elmo for the foreseeable future.
- Washington County proposes to expand Manning Avenue North (CSAH 15) from two to four lanes within the next five years, which will contribute to continued urban development in the CSAH 15 corridor.
- Future development in Baytown and West Lakeland Townships will be limited based on current comprehensive plans and zoning regulations, and lack of municipal water and sanitary sewer services.
- The last major project at the Airport was expansion of the north hangar area in the 1990s, and there are no other major future projects depicted on the Airport Layout Plan apart from those considered under the proposed action for this EA/EAW.

The chief environmental effect of the proposed action is the filling of a total of approximately 2.36 acres of wetlands on Airport property. It is nearly impossible to predict the extent and location of projects in the vicinity of the Airport with potential wetland impacts, especially because private developments. However, a reasonable assessment of the potential for cumulative wetland impacts may be extrapolated from available U.S. Fish & Wildlife Service National Wetland Inventory data.

According to the most recent National Wetland Inventory data, there are approximately 22,271 acres of wetlands in Washington County and approximately 1,985 acres of wetlands within the VBWD, other than those classified as open waters such as lakes, ponds, and rivers. Wetland loss areas for each county in Minnesota are established by state statute based on a 1984 report that compared the percentage of wetlands remaining in each county to the amount of wetlands that county contained prior to European settlement. Although the study is now more than 30 years old, the BWSR's most recent report to the Minnesota legislature indicates the study remains the only statewide estimate of pre-settlement versus existing wetlands. The 1984 report indicated that approximately 42.9 percent of pre-settlement wetlands remain in Washington County because of wetland conversion associated with urban and rural land uses. Assuming this percentage is roughly equivalent to existing conditions when compared to pre-settlement conditions for Washington County and VBWD, Washington County has lost 29,643 acres of wetlands and VBWD has lost 2,642 acres of wetlands since initial settlement. The wetland loss associated with the proposed action is less

than 0.1 percent of wetland loss since pre-settlement in the VBWD, and less than 0.01 percent when considering all of Washington County.

Given excess capacity in the wetland banking system and a demonstrated preference for wetland banking by the state and federal permitting agencies in Minnesota, there is no potential for adverse cumulative effects on wetlands within the wetland Bank Service Area 6 that cannot be mitigated.

Therefore, no single impact, even when considered with past or future actions, represents a substantial impact that cannot be mitigated. No significant cumulative impacts or cumulative potential effects are associated with the no-action alternative or the preferred alternative.

## **VI. Environmental Mitigation and Commitments**

21D has committed to the following required mitigation measures as part of the Proposed Action:

- The Airport will obtain any necessary permits prior to beginning construction.
- The Airport will protect wetlands and waters of the U.S. not directly impacted by the Proposed Action during construction.
- Wetland mitigation will be required as a condition of a permit under the Wetland Conservation Act. The mitigation ratios are determined by Washington County's location within the <50% wetland loss area of the state, which establishes a 2.5:1 base ratio for in-kind mitigation and can be reduced to 2:1 if within the bank area.

The total 2.36-acre impact is divided between about 0.06 seasonally flooded basin (Type 1), 1.66 acre of fresh wet meadow (Type 2), and 0.65 acres of shallow marsh (Type 3) wetland. The MAC will consider wetland banking opportunities during the permitting process. Purchase of wetland bank credits would occur after the exact wetland impact area is determined during design engineering.

- Use of BMPs to avoid additional unnecessary and/or unauthorized impacts to surface waters and aquatic resources.
- The MAC will start convening a JAZB. The process will consider public input as part of developing an airport zoning ordinance. This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state's Model Zoning Ordinance.
- Extinguishing the prescriptive easement for 30th Street North and seeking, as appropriate, a land release for non-aeronautical use from the FAA to allow realignment of 30th Street North near the new Runway 32 RPZ to reconnect with the existing Neal Avenue North intersection. Realignment of the township collector road

30th Street North and conveyance of an appropriate property interest to the appropriate local government authority will be determined after EA/EAW completion.

- All phases of construction would be performed in accordance with FAA AC 150/5370-10B, Standards for Specifying Construction of Airports.
- In the event that human remains or cultural resources are discovered during construction, all work will cease until 21D notifies the SHPO, the above-mentioned THPOS, and the FAA Dakota Minnesota Airports District Office. 21D shall protect the area with carefully placed tarps or construction back fill until cultural resource concerns have been appropriately addressed, and 21D will take action to comply with the National Historic Preservation Act, the Native American Graves Protection and Repatriation Act, and the Archeological Resources Protection Act.
- During construction, in the event that previously unknown contaminants are discovered or if a reportable spill occurs, work shall cease until the Airport notifies appropriate local, state, and Federal agencies.
- If endangered species are sighted during construction, work shall cease in the immediate area of the endangered species and all sightings shall be reported to the USFWS, MNDNR and the FAA.
- To avoid impacts to the NLEB, tree removal will occur between October 1 and April 30. If project impacts to listed species change beyond what is identified in the EA, the Airport will have to inform the FAA Dakota-Minnesota Airport District Office (ADO). The ADO will then reinitiate consultation with the USFWS.
- The MAC will explore the possibility of creating tall grass prairie in a 27.5-acre area south of the planned realignment of 30th Street North. The prairie would be designed as foraging habitat for the RPBB and other pollinators.
- Measures will be taken to help avoid or minimize disruption to the Blanding's Turtle during project construction, including:
  - Avoid filling or dewatering wetlands during the winter.
  - Implement stringent sediment and erosion control methods.
  - Use wildlife-friendly erosion control methods.
  - Monitor for turtles during construction and report any sightings to MDNR.
  - Turtles which are imminent danger will be moved, by hand, out of harm's way. Turtles which are not in imminent danger will be left undisturbed.
  - Silt fencing will be set up to keep turtles out of construction areas and will be removed after the area has been revegetated.

## **VII. Public and Agency Coordination**

Public involvement is a vital component of the NEPA process. Public and agency coordination was conducted throughout the NEPA process (Chapter 7 of the FEA).

The MAC formed a CEP for the proposed project. Five CEP meetings were held on February 21, May 25, August 8, October 19, 2017, and January 16, 2018. The CEP met on these dates because they occurred at key milestones prior to release of the Draft EA/EAW. A sixth and final CEP meeting was held on May 15, 2018, following the close of the public comment period for the Draft EA/EAW. Agendas, presentation materials, and minutes from these meetings are included in Appendix L.

The MAC also held three public meeting events at key milestones prior to release of the Draft EA/EAW on May 11, August 17, and November 6, 2017. These public meetings presented the same information provided at CEP meetings. Agendas, presentation materials, handouts, and minutes from these events are included in Appendix L.

The Draft EA/EAW was released for agency and public review from February 26, 2018-April 19, 2018. The MAC held a Public Hearing on April 4, 2018. Agency and public comments received during the comment period were considered in the development of the FEA. Responses to all verbal and written comments are provided in Appendices M and N of the FEA.

### **VIII. Agency Findings**

The FAA conducted an independent review of the factual assumptions contained in the EA and determined the adequacy of the EA and takes responsibility for the document's scope and content. Individuals from the FAA have devoted substantial attention to the EA in order to ensure compliance with NEPA, and other environmental requirements. Accordingly, I find that the independent and objective evaluation called for by the CEQ has been provided. The FAA has given this proposal the independent and objective evaluation required by CEQ (40 CFR 1506.5).

After careful and thorough consideration of the facts contained herein, I find that the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101(a) of NEPA and other applicable environmental requirements. The proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring consultation pursuant to section 102(2)(c) of NEPA.

Therefore, under the authority delegated to me by the Administrator of the FAA, I find that the proposed airport improvement projects described in the Proposed Action and evaluated in the EA and addressed in this FONSI/ROD are reasonably supported and approved. I direct that action be taken to carry out the following agency actions:

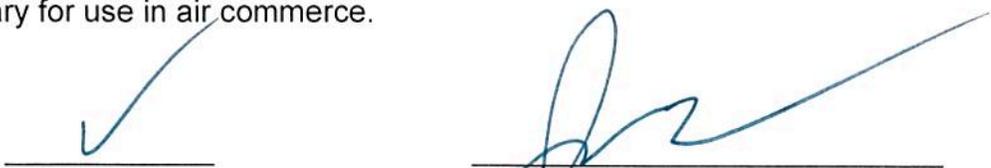
- Unconditional approval of the Airport Layout Plan for the development listed above in the Proposed Action.

- Issue final airspace determinations for the development listed above.
- Determine eligibility for Federal grant-in-aid funds for eligible items.

Having met all relevant requirements for environmental considerations and consultation, the proposed action is authorized to be taken when other requirements have been met. These decisions are taken pursuant to 49 USC § 40101, et seq. The FAA findings regarding the proposed airport improvements and any necessary funding, for the Lake Elmo Airport, constitute an order of the Administrator, which is subject to review by the courts of Appeal of the United States, in accordance with the provisions of Section 1006 of the Federal Aviation Act of 1958, as amended, 49 USC § 46110.

Finally, having based upon the administrative review of this project, I certify, as prescribed by 49 USC § 44502(b) that implementation of the Proposed Action is reasonable necessary for use in air commerce.

APPROVED: \_\_\_\_\_  
 DISAPPROVED: \_\_\_\_\_



James G. Keefer  
 Acting Director, Airports Division  
 FAA Great Lakes Region

DATE: 8-31-18

Right of Appeal

This FONSI/ROD presents the Federal Aviation Administration's final decision and approvals for the actions identified, including those taken under provisions of 49 USC Subtitle VII, Parts A and B. This decision constitutes a final order of the Administrator subject to review by the Courts of Appeals of the United States in accordance with the provisions of Section 1006 of the Federal Aviation Act of 1958, as amended, 49 USC § 46110.