

**MICHIGAN DEPARTMENT OF TRANSPORTATION
OFFICE OF AERONAUTICS**

and

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

**FINDING OF NO SIGNIFICANT IMPACT /
RECORD OF DECISION**

for

RUNWAY 6/24 EXTENSION

at

**ANN ARBOR MUNICIPAL AIRPORT
ANN ARBOR, MICHIGAN**

October 2023

1.0 Introduction

This Finding of No Significant Impact / Record of Decision (FONSI/ROD) has been prepared for a Proposed Project at the Ann Arbor Municipal Airport (ARB or Airport). The Airport is a public-use, general aviation airport owned and operated by the City of Ann Arbor. The Airport is within Pittsfield Charter Township, Washtenaw County, in southeastern Michigan.

The attached Final Environmental Assessment (Final EA) has been prepared in accordance with Federal Aviation Administration (FAA) Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*. Based on the evaluation of the Final EA, there are no potential significant impacts associated with the Airport's Proposed Project. Therefore, an Environmental Impact Statement (EIS) will not be prepared and this FONSI/ROD is being issued. This FONSI/ROD provides a review of the Airport's Proposed Project and the basis of the FAA and the Michigan Department of Transportation Office of Aeronautics (MDOT AERO) findings. Expected environmental consequences of the Proposed Project and mitigation commitments are defined and described further in the Final EA.

A summary of the Proposed Project, which was evaluated in the attached Final EA, is as follows:

2.0 Airport Proposed Project and Federal Action

Michigan administers Airport Improvement Program (AIP) grants under the FAA's State Block Grant Program (SBGP). In accordance with the SBGP, authorized under 49 U.S.C. § 47128, and 14 C.F.R. Part 156, Michigan handles annual AIP grants that go to airports classified as "other than primary" airports, which includes ARB. ARB is classified as a nonprimary regional airport in the 2023-2027 National Plan of Integrated Airport Systems. As part of its responsibilities under the SBGP, the state of Michigan assumes environmental review responsibilities for FAA AIP grants in the state.

Under the SBGP, the state of Michigan provides funding and oversight for this Proposed Project along with the responsibility for evaluating the potential environmental impacts of the project, consistent with the National Environmental Policy Act (NEPA) of 1969. Certain actions are considered outside the scope of the SBGP and are considered connected "Federal Actions" and subject to FAA environmental review. Relocating the FAA owned Runway End Identifier Lights (REILs) at the approach end of Runway 6 is considered a Federal Action requiring FAA involvement and environmental review.

The Airport's Proposed Project includes the following components:

- Extend Runway 6/24 720 feet at the approach end of Runway 6 to provide 4,225 feet of runway length.
- Shift Runway 6/24 to the southwest by adding an additional 150 feet on the Runway 6 end and removing 150 feet on the Runway 24 end.
- Taxiway A - Extend parallel to the southwest to match the Runway 6/24 length.

- Taxiway A1 – Relocate 150 feet to the southwest and reconstruct to comply with FAA Advisory Circular (AC) 150/5300-13B, Section 4.8.1 to correct the taxiway intersection with Runway 6/24 to connect at a right angle.
- Taxiway A4 – Construct new connector taxiway at the Runway 6 end.
- Taxiway D – Relocate 150 feet to the southwest and reconstruct to comply with FAA AC 150/5300-13B, Section 4.3.5 *Runway Access from Apron*, which discourages direct access from an apron to a runway without requiring a turn by aircraft prior to reaching the runway.

The SBGP actions include:

- Unconditional approval of the ALP displaying all components of the Proposed Action.
- Approval of an application for Federal assistance, under the AIP, for eligible components of the Proposed Action.

The FAA's federal actions include:

- Relocation and replacement of the existing FAA owned REIL at the approach end of Runway 6 to the new runway threshold.
- Amendment of necessary air traffic procedures, including instrument approach and departure procedures, to accommodate the proposed action.

3.0 Project Purpose and Need

The purpose of the proposed action is to improve operational utility of the Airport by meeting the takeoff and landing runway length requirements of aircraft that currently operate at the Airport and are projected to gradually increase operations over time.

The proposed action is needed because Runway 6/24 was designed to serve primarily small piston driven aircraft; however, the Airport receives regular use by small turboprop aircraft and occasional business jet aircraft that require a longer runway to operate at a greater payload than they do today.

Analysis of current operations found that aircraft with similar operational performance characteristics routinely use ARB and have runway requirements that exceed the current 3,505-foot length of Runway 6/24 under normal operating conditions. For these users to conduct operations on the existing runway, undue concessions in reduced fuel, passengers and/or cargo loads are often needed. Diversions to other airports are also commonly needed when the runway surface is wet, or during the summer months when higher temperatures reduce aircraft performance.

The Proposed Action also provides an opportunity to improve the airport geometry to enhance the safety of air traffic operations at ARB. In compliance with Section 6.11.7 of AC 150/5300-13B *Airport Design*, the movement areas of the airfield should be observable from the Airport Traffic Control Tower (ATCT) to manage aircraft movement and operations in a safe and efficient manner.

Personnel working in the ATCT currently have limited visibility of the intersection of Taxiway A and Connector Taxiway A1.

4.0 Alternatives Considered

In accordance with FAA Order 1050.1F, a wide range of reasonable alternatives were evaluated to address the purpose and need of the project. The analysis of these alternatives presented in the attached Final EA was prepared to determine different options that may reasonably meet the needs of the Airport. The alternative that best met the project's purpose and need was carried forward as the Preferred Alternative while all other alternatives were dismissed. The range of alternatives that were considered included:

- No Action Alternative – Maintain Existing 3,505 Feet of Runway Length

The No Action Alternative assumes that no action would be taken to address the needs of the Airport. Under this alternative, ARB would remain in its current state and the operating needs of the critical aircraft at ARB would not be met. The obstructed view of the intersection of Taxiway A and Connector Taxiway A1 experienced by the ATCT would remain unchanged.

The No Action Alternative does not meet the project's purpose and need of providing an air transportation facility that meets the operational needs of aircraft that currently operate at the Airport and are projected to modestly increase over time. This alternative also fails to provide a clear line-of-sight of all surface movement areas, takeoff areas, and landing areas for ATCT personnel.

- Alternative 1 – Extend 720 Feet at the Approach End of Runway 24

Under this alternative, Runway 6/24 would be extended 720 feet to the northeast at the approach end of Runway 24 resulting in a total length of 4,225 feet of available runway length.

Taxiway A would be extended to match the runway extension and a new connector taxiway (Taxiway A1) would be constructed to align with the relocated threshold of Runway 24. Existing Taxiway D would also be reconstructed to match the runway extension and be designed to intersect Runway 6/24 at a 90-degree angle. All applicable navigational aids (NAVAIDs), lighting, and signage would be relocated to match the proposed runway extension and would meet FAA design standards.

This alternative would also require State Street to be reconstructed outside of the extended runway, Taxiway D, the Runway Safety Area (RSA), and the Runway Object Free Area (ROFA). The existing roadbed of State Street through these areas would be closed and the pavement, removed. Any property that is not owned or controlled by ARB within the RSA and ROFA would require either acquisition or an avigation easement.

The primary advantage of Alternative 1 is that it offers 4,225 feet of usable runway length that meets the needs of existing and future small turboprop and jet aircraft. Alternative 1 also corrects the geometry of Taxiway D with Runway 6/24 so that it intersects Runway 6/24 at 90-degree angle.

Disadvantages of Alternative 1 include the relocation of State Street around the approach end of Runway 24 and its associated RSA and ROFA surfaces. The State Street relocation would also cause business and private property impacts where it connects to Ellsworth Road, likely causing land and commercial acquisitions. Also, there would be considerable community disruptions and road impacts during construction and realignment of State Street. The ATCT would continue to have visibility deficiencies at the new intersection of Taxiway A and connector Taxiway A1 when aircraft and ground vehicles are in the area.

Wetlands and a 100-year floodplain are found throughout the area east of State Street. It is likely that State Street realignment would cause impacts to wildlife habitat, regulated wetlands, and floodplains.

Alternative 1 is not considered a reasonable alternative because it fails to meet the project's purpose and need of addressing visibility issues experienced by the ATCT.

- Alternative 2 – Shift Runway 150 Feet Southwest and Extend 720 Feet at the Approach End of Runway 6 (Preferred Alternative)

With this alternative, Runway 6/24 would be shifted 150 feet to the southwest and then extended 720 feet at the approach end of Runway 6 to provide 4,225 feet of usable runway length. The runway shift would provide clear visibility and line-of-sight of the new intersection of Taxiway A and connector Taxiway A1 for ATCT personnel.

Taxiway A would be extended to the southwest to match the additional runway length and a new connector taxiway (Taxiway A4) would be constructed to align with the relocated threshold of Runway 6. All applicable NAVAIDs, lighting systems, and signage would be relocated to match the proposed runway extension including the existing FAA-owned REILs found at the approach end of Runway 6.

Existing Taxiway D and Taxiway A1 would be relocated 150 feet to the southwest and reconstructed. Alternative 2 also corrects the geometry of Taxiway D with Runway 6/24 so that it intersects Runway 6/24 at a right angle.

This 150-foot shift and runway extension to the southwest also keeps the RPZ at the approach ends of Runways 6 and 24 entirely within existing Airport property, eliminating the need for land acquisition or easements to control land uses within these areas.

There are few environmental concerns or potential impacts associated with Alternative 2. Two regulated wetlands and a constructed agricultural drainage ditch were field delineated

off the end of Runway 6. Preliminary design indicates that impacts to both regulated wetlands can be avoided. According to the Flood Insurance Rate Maps, the area southwest of the existing Runway 6 threshold is located within a 100-year floodplain. Alternative 2 is expected to have minor floodplain impacts.

This alternative would, however, result in aircraft transiting lower, albeit at a safe altitude, over Lohr Road. Currently, aircraft on a standard approach to Runway 6 pass over Lohr Road at approximately 72 feet. With the runway extension, aircraft on a standard approach to Runway 6 would transit over Lohr Road at approximately 49 feet.

Alternative 2 is considered a reasonable alternative because it fully meets the project's purpose and need, satisfies all safety area requirements, and has minimal community, road, and environmental impacts.

- Alternative 3 – Extend 360 Feet at Both Ends of Runway 6/24

Alternative 3 proposes to achieve a runway length of 4,225 feet with the construction of a 360-foot extension on each end of Runway 6/24.

At the approach end of Runway 6, a 360-foot extension of the runway and parallel Taxiway A as well as the construction of a new Taxiway A4 connector would be built to align with the new runway threshold. At the approach end of Runway 24, a 360-foot extension of the runway and parallel Taxiway A would occur and Taxiway A1 would also be relocated. Existing Taxiway D would be reconstructed to match the runway extension and be designed to intersect Runway 6/24 at a 90-degree angle. All applicable NAVAIDs, lighting systems, and signage would be relocated to match the extensions at each runway end, including the relocation of existing FAA-owned REILs at the approach end of Runway 6.

With the runway extending to the northeast, State Street would be relocated so that its new alignment would be constructed around the approach end of Runway 24 and the associated RSA and ROFA surfaces. The existing roadbed of State Street would be closed, and the pavement, removed. Acquisition of land would be required to relocate State Street, and aviation easements within the relocated RPZ at the approach end of Runway 24 for portions outside of the existing Airport property would be needed. No RSA or ROFA impacts are anticipated with the 360-foot extension of Runway 6 to the southwest.

Environmental impacts can be expected with the 360-foot extension of Runway 24 and State Street realignment to the northeast where wetlands and floodplains are found throughout the Runway 24 approach. There are no environmental concerns or potential impacts associated with the extension of Runway 6 to the southwest.

The primary advantage of Alternative 3 is that it provides 4,225 feet of usable runway length for small turboprop and jet aircraft that currently operate at the Airport. This alternative

would also realign Taxiway D so that it has a standard 90-degree intersection with Runway 6/24 to address direct access issues from a taxiway onto a runway.

Disadvantages associated with Alternative 3 include the relocation of State Street around the approach end of Runway 24 and its associated RSA and ROFA surfaces. This alternative would cause business and private property impacts where State Street reconnects to Ellsworth Road, likely causing land and commercial acquisitions. Also, community and road disruptions during construction are expected.

Another disadvantage of Alternative 3 is that the ATCT will continue to have visibility concerns at the intersection of Taxiway A and connector Taxiway A1. The relocation of the intersection farther to the northeast would worsen the current line-of-sight issue.

Alternative 3 is not considered a reasonable alternative because it fails to meet the project's purpose and need of addressing ATCT visibility issues associated with the intersection of Taxiway A and connector Taxiway A1. Although Alternative 3 provides adequate runway length for current and future users, it fails to provide line-of-sight of the entire movement area of the airfield.

5.0 Preferred Alternative

After a thorough analysis of the advantages and disadvantages of each alternative, the alternative that best meets the project's purpose and need is Alternative 2 – Shift Runway 150 Feet Southwest and Extend 720 Feet at the Approach End of Runway 6.

Alternative 2 offers many advantages over the other alternatives. Alternative 2 provides 4,225 feet of needed runway length for small turboprop and jet aircraft that currently operate at ARB. Alternative 2 would be built entirely within the existing Airport property boundary without requiring the relocation of State Street or causing property or road construction impacts.

Shifting the runway 150 feet to the southwest eliminates the existing obstructed view from the ATCT so that air traffic controllers can view the entire movement area of Taxiway A and Runway 6/24. Alternative 2 also corrects the geometry of Taxiway D with Runway 6/24 thus meeting FAA design standards.

The 150-foot shift and runway extension to the southwest also keeps the RPZ at the approach end of Runway 6 and Runway 24 entirely on existing ARB property, consequently eliminating the need for land acquisition or easements to further control land uses within these areas.

The selection of Alternative 2 as the Preferred Alternative for this project has been recommended by the Airport and MDOT AERO.

6.0 Public Review and Comment

Resource agencies and Native American tribes were contacted at the beginning of the project and given the opportunity to provide comment on the proposed action. A copy of the early coordination letters received are found in **Appendix A - Early Agency Coordination** of the Final EA.

A legal Public Notice (Notice) was advertised in the *Ann Arbor News* (both print and online editions) for 30 days prior to a Public Hearing held December 13, 2022. The Notice explained that the Draft EA was available for public review and announced the date, time, and location of the Public Hearing and document viewing opportunities. The Draft EA was available for public review 30 days prior to the Public Hearing and 30 days after the meeting until January 13, 2023. The Draft EA was available on the Airport's website and hard copies were available at the following four locations:

- Ann Arbor Municipal Airport
- Ann Arbor District Library
- City Clerk's Office, Guy C. Larcom City Hall
- Pittsfield Charter Township Clerk's Office

To further increase public awareness, the project was also promoted on the City of Ann Arbor's events calendar and advertised in their December 2022 community newsletter, with periodic posts via Facebook.

The Public Hearing was held at the Guy C. Larcom City Hall building in Ann Arbor, Michigan, on December 13, 2022, from 5:30 PM to 8:00 PM. The purpose of the Public Hearing was to present the Preferred Alternative and its associated impacts to the public and receive written and oral comments on the proposed action. A court reporter was also present to record verbal comments from the public.

The Public Hearing was a drop-in event with a series of stations dedicated to specific topics. A dedicated team member or Airport staff person was at each station to answer questions. Attendees could arrive at any time and could choose to visit each station or select specific areas of interest. A printed open house guide was provided to inform guests of the station topics. According to the Public Hearing sign-in sheets and court reporter records, approximately 46 people attended the Public Hearing.

See **Appendix Q Public Comments Received** and **Appendix R Agency Comments Received** in the Final EA for copies of the actual letters received from the public and regulatory agencies during the commenting period of the Draft EA.

7.0 Environmental Consequences and Mitigation of the Preferred Alternative

This section presents an analysis of the expected impacts of the Preferred Alternative on the social, environmental, and economic environments of the area surrounding the Airport and describes avoidance or mitigation measures to minimize impacts. Only those resources where impacts are

anticipated, or mitigation is required are described. For a comprehensive discussion of the environmental consequences of the Preferred Alternative see the attached Final EA.

- Air Quality

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

Aircraft operations and ground support equipment emissions were estimated for the Preferred Alternative. Project-related emissions are expected to slightly increase due to the additional 720 feet of aircraft taxiing distance and the slight increase in the number of operations in the future. Analysis determined that project-related emissions from the Preferred Alternative would be below the CAA defined de minimis threshold, and thus do not require a conformity determination. No further analysis is required, and no mitigation is proposed.

However, to further reduce the potential for temporary air quality impacts for both workers and the surrounding area, The *Construction Emission Control Checklist* provided by the USEPA (found in **Appendix R Agency Comments Received**) should be followed where feasible. Although the Airport will strongly encourage the use of the USEPA checklist, the Airport must follow applicable FAA ACs and construction guidelines. Construction contracts will identify any applicable requirements that contractors must follow.

The following supplementary air quality recommendations will also be considered during the construction of the Preferred Alternative. These recommendations may be implemented and incorporated by the Airport during construction where feasible:

- Use low-sulfur diesel fuel (less than 0.05% sulfur).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Position the exhaust pipe so that the diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Use climate-controlled cabs that are pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operator's exposure to diesel fumes. Pressurization ensures that air is moved from the inside to the outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintain diesel engines, which is essential to keeping exhaust emissions low, and follow the manufacturer's recommended maintenance schedule. For example, blue/black smoke indicates that an engine requires servicing or tuning.

- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel operators to perform routine inspections, and maintaining filtration devices.
- Purchase new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids as block heaters to warm the engine to reduce diesel emissions.

- Biological Resources

The U.S. Fish and Wildlife Service (USFWS) and the Michigan Department of Environment, Great Lakes, and Energy (EGLE) provided information regarding protected species in the vicinity of the project area. Agency coordination determined that no critical habitat under their jurisdiction is found in the project area. Biological field investigations also did not identify any protected species or habitat beyond the Henslow's Sparrow (which is regularly sighted at the Airport), the Indiana Bat, and the Northern Long-eared Bat (NLEB).

Since the Henslow's Sparrow is known to occur at ARB, any grading or construction near State Road would be in an area currently under "restricted mowing" per a voluntary verbal agreement with the Washtenaw Audubon Society (a chapter of Michigan Audubon) and the City of Ann Arbor. To avoid potentially impacting Henslow's Sparrows during construction of the Preferred Alternative, ARB will not allow grading within agreed upon restricted mowing areas during the breeding season, which extends from early spring through mid-July.

The forested area in the southwest corner of the Airport contains large stands of buckthorn with isolated aspen and box elder trees interspersed. Vegetation within this area contains a low diversity mix of grasses and forbs. Generally, this type of habitat is not conducive to supporting either the NLEB or the Indiana bat's habitat needs. Tree removals are not expected with the construction of the Preferred Alternative.

A summary of biological mitigation includes:

- To avoid potentially impacting Henslow's Sparrows during construction of the Preferred Alternative, no grading within agreed upon restricted mowing areas during the breeding season, which extends from early spring through mid-July.
- Tree clearing will only be allowed between October 1 – March 31 to minimize impacts to any potential bat populations.
- Habitat disturbance will only be allowed between October 1 – March 31 to minimize impacts to protect migratory birds.
- If during construction a threatened or endangered species or species of special concern is discovered, the USFWS or EGLE should be contacted for guidance and permitting requirements.

- Farmland

Coordination with the U.S. Department of Agriculture's (USDA) Natural Resource Conservation Services (NRCS) confirmed ARB's location within an "Urbanized Area" and exempt from farmland impacts and mitigation requirements.

The Airport currently leases property for active farming. If construction of the Preferred Alternative takes place, approximately two acres of active farming land will be taken out of production at the Runway 6 end. Although this farming activity is not protected, the City of Ann Arbor and Broadview Farms will need to renegotiate the farming agreement in the future.

- Hazardous Materials, Solid Waste, and Pollution Prevention

While there is no known hazardous waste contamination within the project area, construction activities associated with the Preferred Alternative have the potential to create solid waste material (excavated soil, remnant concrete, etc.). The following is a summary of the mitigation required to address any potential impacts:

- The contractor is required to have a Spill Prevention, Control, and Countermeasure (SPCC) plan in place to be implemented if a spill occurs during construction operations.
- An approved erosion control plan is required.
- Any waste generated through project improvements will be disposed of in compliance with all federal, state, and local regulations.

- Land Use

Although State Street continues to be an incompatible land use within the Runway 24 Runway Protection Zone (RPZ) of the Preferred Alternative, the City of Ann Arbor will mitigate the incompatible land use by coordinating with the Washtenaw County Road Commission on installation of signage to notify drivers using State Street.

During a wildlife site visit (WSV), USDA personnel observed several species including deer, Canadian geese, red-tailed hawks, and European starlings on the airfield. The WSV determined that deer and the lack of a deer-proof perimeter fence were concerns to Airport operations, and the Airport should also consider measures to address avian hazards as well. The Airport should consider implementing the following recommendations from the WSV:

- Enclose the airfield with a deer-proof fence.
- Aggressively cull deer until a wildlife fence can be installed.
- Phase out agricultural activity on Airport property.
- Develop and implement a comprehensive Wildlife Hazard Management Plan.
- Report and review any wildlife strikes.
- Monitor wildlife populations and abundance on the ARB property.

- Remove Airport land from agricultural production and replace with ground cover (expected to be completed in 2024).
- Natural Resources and Energy Supply

Electric or gas use required to operate ARB facilities is not expected to substantially increase because of the Proposed Project. It is the intention of ARB to replace all runway and taxiway lighting with light-emitting diode (LED) lights, and not just the proposed extension, to further reduce energy consumption.

Best Management Practices (BMPs) to reduce energy consumption during construction will be employed, where applicable. To reduce energy consumption associated with the temporary use of excavators and vehicles for the Preferred Alternative, construction equipment should be in good working order to ensure the most efficient use of fuel. All vehicles and equipment should be checked for leaks and repaired immediately. The following recommendations should be implemented where feasible:

- Consider using LED lights to reduce energy consumption.
 - Employ BMPs to reduce energy consumption during construction, where applicable.
 - To reduce energy consumption associated with the temporary use of excavators and construction vehicles, equipment should be in good working order to ensure the most efficient use of fuel.
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

During construction activities, temporary impacts on Airport operations are expected. The runway would be closed for approximately seven days. Operations would be impacted during construction, and flight schedules will require adjustments. The following mitigation measures will be implemented:

 - Runway closure notice will be given to users with a detailed construction schedule as to provide enough time to adjust flight schedules.
 - If possible, runway closures will not occur during the University of Michigan home football games.

No residential, business, or farm relocations will be required as part of this proposed project. All development will take place on existing ARB property; therefore, no alteration of surface transportation patterns, community disruptions, or disruptions of orderly, planned development are expected. Environmental justice impacts from the construction or operation of the Preferred Alternative are not anticipated. No mitigation is proposed. All construction under the proposed action would occur on ARB owned property, and access to the site would be restricted. It is unlikely that the development of the Preferred Alternative will include products or substances a child is likely to encounter. It is therefore unlikely that

the Preferred Alternative will result in any environmental health or safety risks that could disproportionately affect children. Children's Environmental Health and Safety Risks Impacts from the construction or operation of the Preferred Alternative are not anticipated. No mitigation is proposed.

- Wetlands

It is unlikely that regulated wetlands will be directly or indirectly impacted by the construction of the Preferred Alternative as preliminary design indicates that all wetland areas can be avoided.

However, if during final design of the Preferred Alternative, design modifications cause impacts to regulated wetlands, coordination with EGLE will be required to determine appropriate permitting and mitigation activities. If impacts are identified, a Part 303, PA451 *Wetland Protection Permit* would be required prior to construction activities.

All delineated wetlands will be shown on construction plans to protect them from any possible direct or indirect impacts, and construction documents will require avoidance and erosion control measures.

- Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), the project area at the Runway 6 end is located within a 100-year floodplain associated with the Wood Outlet drain. The following mitigation is required:

- An EGLE Part 31, Floodplain Permit.
- Proposed mitigation will be a compensating cut of material within the limits of the same floodplain in an upland area not classified as a protected resource (e.g., wetland or threatened or endangered species habit).

- Surface Waters

The RSA and ROFA of the proposed Runway 6 extension will intersect an unnamed drain; however, the ditch flows inside an existing reinforced concrete culvert at this location. Preliminary design indicates that drain impacts can be avoided. No alignment changes or construction impacts to the unnamed drain are expected. However, if drain impacts are later identified because of design modifications, coordination with EGLE will be required to determine appropriate permitting and mitigation activities. Other surface water resources (ponds/lakes) in the vicinity of the Airport will not be impacted by the Proposed Project since they are well outside of the project area.

The proposed construction of the Preferred Alternative will increase impervious surface areas and likely increase storm water runoff. New impervious surfaces are estimated to be 1.88 acres (81,893 square feet). To protect area surface and ground water resources, additional storm water runoff will drain into the Airport's existing drainage system in

accordance with its Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will also be updated to include BMPs to reduce erosion and discharge of pollutants from construction activities.

Since soil erosion is a source of concern as a possible adverse impact to surface waters from construction projects. The following list of BMPs represents common erosion control measures that should be considered during construction and applied where applicable:

- Sediment traps
- Temporary cement ponds
- Temporary grassing of disturbed areas
- Vegetation cover replaced as soon as possible
- Erosion mats and mulch
- Silt fencing and drainage check dams
- Settling basins for storm water treatment
- All excavated soils and staging areas for construction equipment will be placed in non-sensitive upland areas with disturbed areas replanted as soon as possible to reduce the likelihood of erosion.
- Mitigation measures prepared under an erosion control plan in accordance with FAA AC 150/5370-10H, *Standards for Specifying Construction of Airports*, will help minimize long-term impacts to area water quality and to the existing drainage system.

The following surface water permits are also required:

- In accordance with Part 91, Michigan Soil Erosion and Sedimentation Control of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, a soil erosion permit and a storm water runoff control permit are required from Pittsfield Charter Township.
 - Obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activity disturbing one acre or more of soil.
 - Permittees are required to control runoff from construction sites and develop a construction SWPPP that includes erosion prevention and sediment control BMPs.
- Ground Water

The additional impervious surfaces within a project area can decrease the land available for water infiltration. Under the Preferred Alternative, a net increase of approximately 1.88 acres of impervious surfaces will occur due to new pavement. The proposed action will slightly decrease groundwater infiltration within the project area due to the additional impervious surfaces; however, this is not expected to tangibly impact ground water recharge rates or impact public water supply.

No violations to water quality standards under the Safe Drinking Water Act (SDWA) are anticipated with the Preferred Alternative since no water wells are within the project area. However, since ARB is located within a wellhead protection area, FAA AC 150/5320-15A, *Management of Airport Industrial Waste* will be implemented and the following ground water BMPs should be considered to prevent and minimize impacts to ground water in the project area:

- Schedule construction activities for dry weather periods, if possible.
 - Designate a contained area for equipment storage, short-term maintenance, and refueling at least 100 feet from wetland areas.
 - Routinely inspect vehicles and equipment for leaks and repair immediately.
 - Clean up leaks, drips, and other spills immediately to avoid soil or surface water contamination.
 - Ensure that all spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries are collected, stored, and recycled as hazardous waste off site.
 - Ensure that all construction debris is taken to appropriate landfills and all sediment disposed of in upland areas or off-site.
- Irreversible and Irrecoverable Commitment of Resources

Some natural or human-made resources will be spent or produced during construction of the proposed action such as fuel, construction materials, and debris. Whenever possible, construction materials will be recycled and/or reused to limit waste rather than be discarded in local landfills.

Consideration will also be given to the USEPA's *Sustainable Management of Construction and Demolition Materials and Large-Scale Residential Demolition* recommended practices and implemented where feasible. However, the Airport is required to follow FAA AC 150/5320-15A, *Management of Airport Industrial Waste* and AC 150/5300-13B, *Airport Design* during construction before any other regulatory guidance.

8.0 MDOT AERO Finding

Michigan administers Airport Improvement Program (AIP) grants under the FAA’s State Block Grant Program (SBGP). The SBGP, authorized under 49 U.S.C. § 47128, and 14 C.F.R. Part 156, allows the state of Michigan to assume environmental review responsibilities for FAA AIP grants in the state. After careful and thorough consideration of the facts contained in the attached Final EA, the undersigned MDOT AERO finds the Proposed Action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the NEPA and other applicable environmental requirements and will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to Section 102(2)(C) of NEPA.

APPROVED:

DISAPPROVED:

Michael G. Trout, A.A.E.

Digitally signed by: Michael G. Trout, A.A.E.
DN: CN = Michael G. Trout, A.A.E. email = TroutM1@michigan.
gov C = US O = MDOT OU = Office of Aeronautics
Date: 2023.10.09 15:42:39 -04'00'

Executive Administrator

Responsible MDOT Official

Title

Michigan Department of Transportation Office of Aeronautics

Date: 10/9/23

9.0 FAA Finding

After careful and thorough consideration of the facts contained in the attached Final EA, the undersigned FAA finds the proposed FAA federal actions are consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the NEPA and other applicable environmental requirements and will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to Section 102(2)(C) of NEPA.

Having met all relevant requirements for environmental considerations and consultations, the proposed FAA federal actions are authorized to be taken at such time as other requirements are met.

The decisions related to the federal actions are taken pursuant to 49 U.S.C. § 40101, et seq. The FAA findings regarding the proposed federal actions for the Ann Arbor Municipal Airport, constitutes an order of the Administrator, which is subject to review by the Court of Appeals of the United States, in accordance with the provisions of Section 1006 of Federal Aviation Act of 1958, as amended, 49 U.S.C. § 46110.

APPROVED:

DISAPPROVED:

ERIK AMEND

Digitally signed by ERIK AMEND
Date: 2023.10.16 17:43:58 -04'00'

Regional Administrator

Responsible FAA Official

Title

U.S. Department of Transportation Federal Aviation Administration

Date: 10/16/23

This FONSI/ROD constitutes a final agency action and a final order taken pursuant to 49 U.S.C. §§ 40101 et seq., and constitutes a final order of the FAA Administrator which is subject to exclusive judicial review by the Courts of Appeals of the United States in accordance with the provisions of 49 U.S.C. § 46110. Any party having substantial interest in this order may apply for a review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.