
Appendix D – Early Agency & Tribal Coordination

List of Agencies and Tribes that Received Early Coordination Letters Requesting Information and Comments

Agency & Political Coordination - Master List						
Salutation line	Contact Name	Title	Organization	Address	City, State, Zip	Phone
Mr. Conway	Brian Conway	State Historic Preservation Officer	State Historic Preservation Office, State Housing Development Authority	735 E. Michigan Avenue, P.O. Box 30044	Lansing, Michigan 48909	517-373-1630
Mr. Duffiney	Tony Duffiney	State Director	USDA - APHIS Wildlife Services	2803 Jolly Rd., Suite 100,	Okemos, MI 48864	517-336-1928
Mr. Watling	Jim Watling	Supervisor	MDEQ, Water Resources Division, Transportation Review Unit	525 W Allegan St	Lansing, MI 48933	517-599-9002
Mr. Simon	Charlie Simon	Chief	U.S. Army Corps of Engineers, Detroit District, Regulatory & Permits	477 Michigan Avenue, Room 603	Detroit, MI 48226-2550	313-226-2218
Mr. Joseph	James K. Joseph	Regional Director	Federal Emergency Management Agency, Region 5	536 South Clark Street, 6th Floor	Chicago, Illinois 60605	312-408-5500
	Jean Gagliardo	District Conservationist	USDA, Natural Resource Conservation Service, Portage Service Center	5950 Portage Rd	PORTAGE, MI 49002	269-382-5121 ext 3
Mr. Hicks	Scott Hicks	Field Office Supervisor	US Fish and Wildlife - Michigan Field Office	2651 Coolidge Road, Suite 101	East Lansing, Michigan 48823	517-351-6274
Mr. Westlake	Mr. Kenneth Westlake	Chief	EPA Region 5 , NEPA Implementation Section	77 West Jackson Boulevard	Chicago, Illinois 60604	
Ms. Kik	Rebekah Kik	Director	Community Planning & Development, City of Kalamazoo	415 E Stockbridge Ave	Kalamazoo, MI 49001	
Mr. Forth	Chris Forth	Deputy Director of Planning	Department of Community Development, Planning	7900 S. Westnedge Ave	Portage, MI 49002	
Ms. Stefforia	Jodi Stefforia	Planning & Zoning Administrator	Charter Township of Comstock	6138 King Hwy	Kalamazoo, MI 49048	
Mr. Speeter	John Speeter	Supervisor	Pavilion Township	7510 E. Q Ave.	Scotts, MI 49088	
Mr. Hudson	Patrick Hudson	Planning & Zoning Administrator	Kalamazoo Charter Township	1720 Riverview Dr.	Kalamazoo, MI 49004	
Ms. Jarnefelt	Lotta Jarnefelt	Director	Planning & Development Department, Kalamazoo County	201 W. Kalamazoo Ave.	Kalamazoo, MI 49007	
Ms. Hanna	Shannon Hanna	Natural Resources Deputy	Michigan Department of Natural Resources, Executive Division	525 W Allegan St	Lansing, MI 48933	517-284-5810
Native American Coordination - Master List						
Salutation line	Contact Name	Title	Organization	Address	City, State, Zip	Phone
Chairperson			Bay Mills Indian Community of Michigan	12140 West Lakeshore Drive	Brimley, MI 49175	
Chairperson			Grand Traverse Band of Ottawa and Chippewa Indians of Michigan	2605 NW Bayshore Drive	Suttons Bay, MI 49682	
Chairperson			Hannahville Indian Community of Michigan	N14911 Hannahville B1 Road	Wilson, MI 49896-9728	
Chairperson			Huron Potawatomi, Inc	2221 1-1/2 Mile Road	Fulton, MI 49052	
Chairperson			Keweenaw Bay Indian Community of Michigan	Keweenaw Bay Tribal Center, 107 Beartown Road	Baraga, MI 49908	
Chairperson			Lac Vieux Desert Band of Lake Superior Chippewa of Michigan	4698 US 45	Watersmeet, MI 49969	
Chairperson			Little River Band of Ottawa Indians	2608 Government Center Drive	Manistee, MI 49660	
Chairperson			Little Traverse Bay Bands of Odawa Indians	7500 Odawa Circle	Harbor Springs, MI 49740-9692	
Chairperson			Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians	2872 Mission Drive	Shelbyville, MI 49344	
Chairperson			Pokagon Band of Potawatomi Indians of Michigan	58620 Sink Road	Dowagiac, MI 49047	
Chairperson			Saginaw Chippewa Indian Tribe of Michigan	7070 East Broadway	Mt. Pleasant, MI 48858	
Chairperson			Sault-Ste. Marie Tribe of Chippewa Indians of Michigan	523 Ashman Street	Sault Ste. Marie, MI 49783	
Chairperson			Burt Lake Band of Ottawa and Chippewa Indians	6461 Brutus Road, Box 206	Brutus, MI 49716	
Chairperson			Grand River Band of Ottawa Indians	1316 Front Ave NW	Grand Rapids, MI 49504	
Chairperson	Fred Jacko, Jr.	Culture Department Manager	Nottawaseppi Huron Band of Potawatomi	1485 Mno-Bmadzewen Way	Fulton, MI 49052	269.704.8307

Example of Letters Sent to Federal, State, and Local Agencies



U.S. Department
of Transportation
**Federal Aviation
Administration**

Detroit Airports District Office
11677 South Wayne Road
Suite 107
Romulus, MI 48174

April 3, 2019

«Contact_Name»

«Title»

«Organization»

«Address»

«City_State_Zip»

Re: Early Coordination Review of Proposed Improvements
Kalamazoo/Battle Creek International Airport, Kalamazoo, Michigan

Dear «Salutation_line»:

The Federal Aviation Administration (FAA) has authorized the Kalamazoo/Battle Creek International Airport (Airport) to explore the potential impacts of a 1,150-foot extension of Runway 17/35 and realignment of Taxiway C. The proposed project would extend the existing 6,502-foot runway to an overall runway length of 7,652 feet (150' to the north and 1,000' to the south) and reconfigure Taxiway C at the approach end of Runway 17.

The extension of Runway 17/35 would provide additional length to accommodate the commercial service aircraft that operate at the Airport. The Taxiway C realignment would correct geometry deficiencies and improve situational awareness of aircraft operating on the airfield.

To proceed with the proposed action, an Environmental Assessment (EA) will be necessary to define and analyze potential impacts of the proposed action and evaluate any reasonable alternatives. This EA will also be developed to further determine whether any potential impacts are significant enough to necessitate an Environmental Impact Statement (EIS). During the EA project, investigations will be conducted to identify potential Social, Economic, and Environmental (SEE) impacts related to the improvements being proposed. These SEE impacts will be documented and considered as required by the National Environmental Policy Act (NEPA).

The FAA is the lead federal agency and as such, the EA will be prepared in accordance with NEPA, FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B. *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

April 3, 2019

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It should be noted that the FAA does not necessarily endorse the proposed project, nor have they agreed to a Preferred Alternative. The FAA has merely directed the Airport to fully evaluate the Purpose and Need, any prudent and feasible alternatives including the No-Build Alternative, and to identify associated impacts in order to select a Preferred Alternative. A summary of the proposed action includes:

- Extend Runway 17 by 150 feet
- Extend Runway 35 by 1,000 feet
- Realign Taxiway C at the approach end of Runway 17
- Extend parallel Taxiway B to match Runway 17/35 extension
- Relocate an existing railroad spur (owned by Norfolk Southern) on the south end of the Airport, including land acquisition
- Obstruction clearing on Runway 17 and Runway 35
- Preliminary aviation easements/land acquisition in both Runway 17 and Runway 35 approaches for obstruction clearing
- Relocate existing aircraft navigational aids
- Noise analysis to lift/modify an existing noise curfew for aircraft operating at night
- Development of new aircraft procedures for Runway 17/35
- Completion a hazardous materials Phase I and Phase II Environmental Site Assessments on acquired property

As part of our early agency coordination, we are attempting to identify key issues that will need to be addressed during the NEPA process. To accomplish this, your organization's comments are being requested for the above referenced project as it relates to the following:

- Your specific areas of concern / regulatory jurisdiction
- Specific benefits of the project for your organization or to the public
- Any available technical information / data for the project site
- Potential mitigation / permitting requirements for project implementation

For your convenience, several maps and figures are enclosed that illustrate the site location and approximate project area limits. In order to sufficiently address key project issues and maintain the project schedule, your comments are requested by **May 20, 2019**.

Please send your written or email comments to:

MEAD & HUNT, Inc.
William Ballard, AICP
2605 Port Lansing Road
Lansing, MI 48906
517-321-8334
william.ballard@meadhunt.com

«Contact Name»

April 3, 2019

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In addition to the early coordination request described above, the Airport will be holding a future on-site agency scoping meeting. The purpose of this meeting is to provide project background information, tour the project area, discuss agency concerns, and solicit comments to assist the Airport and the FAA in developing a comprehensive EA. The exact date and time of the on-site meeting has not been determined but is tentatively scheduled for the month of June 2019. An official invite will be sent to your organization when a date has been selected.

Sincerely,

A handwritten signature in cursive script that reads "Ernest Gubry".

Ernest Gubry
Environmental Protection Specialist, Detroit - ADO
734-229-2905

Enclosures

Cc: Dave Reid, Airport Director
William Ballard, Mead & Hunt

Example of Letters Sent to Tribal Nations



U.S. Department
of Transportation
**Federal Aviation
Administration**

Detroit Airports District Office
11677 South Wayne Road
Suite 107
Romulus, MI 48174

April 3, 2019

«Contact_Name»

«Title»

«Organization»

«Address»

«City_State_Zip»

Re: Early Coordination Review of Proposed Improvements
Kalamazoo/Battle Creek International Airport, Kalamazoo, Michigan

Dear Chairperson:

On behalf of the Federal Aviation Administration (FAA), this letter serves to inform you of a project planned for the Kalamazoo/Battle Creek International Airport (Airport), Kalamazoo, Michigan.

The FAA has authorized the Airport to explore the potential impacts of a 1,150-foot extension of Runway 17/35 and realignment of Taxiway C. The proposed project would extend the existing 6,502-foot runway to an overall runway length of 7,652 feet (150' to the north and 1,000' to the south) and reconfigure Taxiway C at the approach end of Runway 17.

A summary of the proposed action includes:

- Extend Runway 17 by 150 feet
- Extend Runway 35 by 1,000 feet
- Realign Taxiway C at the approach end of Runway 17
- Extend parallel Taxiway B to match Runway 17/35 extension
- Relocate an existing railroad spur (owned by Norfolk Southern) on the south end of the Airport, including land acquisition
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- Preliminary aviation easements/land acquisition in both Runway 17 and Runway 35 approaches for obstruction clearing
- Relocate existing aircraft navigational aids

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April 3, 2019

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- Noise analysis to lift/modify an existing noise curfew for aircraft operating at night
- Development of new aircraft procedures for Runway 17/35
- Completion a hazardous materials Phase I and Phase II Environmental Site Assessments on acquired property

Major ground disturbance activities include construction of a runway extension, taxiway reconfiguration, relocation of a railroad, addition of lighting facilities, and relocation of existing aircraft navigational aids. The enclosed figures illustrate the site location and approximate project area limits.

The FAA would be pleased to receive your comments regarding this project, information you wish to share pertaining to archaeological or historical resources located in the project area, or notification that you would like to become an interested party under Section 106 of the National Historic Preservation Act. In order to sufficiently address key project issues and maintain the project schedule, your comments are requested by **May 20, 2019**.

Your response should be addressed to:

Mr. Ernest Gubry
Federal Aviation Administration
Detroit Airports District Office
11677 South Wayne Road, Suite 107
Romulus, Michigan 48174
(734) 229-2905 / Ernest.Gubry@faa.gov

Sincerely,



Ernest Gubry
Environmental Protection Specialist

Enclosures

cc: Dave Reid, Airport Director
William Ballard, Mead & Hunt

William Ballard

From: William Ballard
Sent: Tuesday, April 9, 2019 10:55 AM
To: Christopher Forth
Subject: RE: Kalamazoo/Battle Creek international Airport Expansion Project

Hello Christopher:

I appreciate your acknowledgment of my letter. To answer your question – yes, coordination with Pfizer, Mann + Hummel, and Norfolk Southern Railroad has been ongoing and will continue throughout the project. They are aware of the project and we have established contacts with them.

Don't hesitate to reach out to me with any comments or questions you might have.

Have a great day.

Bill

William Ballard, AICP | Project Manager

Mead & Hunt, Inc | M & H Architecture, Inc | 2605 Port Lansing Road | Lansing, MI 48906
Main: 517-321-8334 | Direct: 517-908-3105 | Cell: 989-640-1060
william.ballard@meadhunt.com | www.meadhunt.com

Use the following link to send me files using our file transfer system:

<https://newforma.meadhunt.com/UserWeb/Transfers/PersonalTransfer.aspx?personal=william.ballard%40meadhunt.com>

From: Christopher Forth <forthc@portagemi.gov>
Sent: Tuesday, April 9, 2019 10:33 AM
To: William Ballard <william.ballard@meadhunt.com>
Subject: Kalamazoo/Battle Creek international Airport Expansion Project

Good morning William:

I am in receipt of your April 3, 2019 letter concerning a request for preliminary comments related to the proposed airport expansion project. The City Administration will review the information and provide you with comments by the requested due date.

At this time, I do have one question: Have you or perhaps someone else also reached out to a representative of Pfizer and Mann + Hummel? I'm assuming so, but want to confirm in the event city staff is contacted.

Let me know when you have a moment.

Christopher Forth, AICP
Deputy Director of Planning, Development and Neighborhood Services

City of Portage Department of Community Development
7900 South Westnedge Avenue
Portage, Michigan, 49002
Direct dial: 269.329.4474
www.portagemi.gov

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DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, DETROIT DISTRICT
477 MICHIGAN AVENUE
DETROIT MI 48226-2550

April 30, 2019

REPLY TO
ATTENTION OF:

Engineering & Technical Services
Regulatory Office
File No. LRE-1990-2390030-A19

William Ballard, AICP
Mead & Hunt, Inc
2605 Port Lansing Rd
Lansing, Michigan 48906

Dear Mr. Ballard:

This is in response to your letter regarding the Corps of Engineers' (Corps) jurisdiction at the Kalamazoo/Battle Creek International Airport in Kalamazoo, Michigan.

In 1984 a portion of the Corps' regulatory responsibilities was assumed by the Michigan Department of Environment, Great Lakes, and Energy (EGLE). This project site is within the assumed area. Unless otherwise notified, a separate authorization from the Corps is not required; however, you may need to obtain a permit from the EGLE. Therefore, we recommend that you contact the EGLE, Kalamazoo District Office for a determination of State permit requirements.

Should you have any questions, please contact me at the above address, by E-Mail at Katie.L.Otanez@usace.army.mil, or by telephone at (313) 226-5479. In all communications, please refer to File Number LRE-1990-2390030-A19.

We are interested in your thoughts and opinions concerning your experience with the Detroit District, Corps of Engineers Regulatory Program. If you are interested in letting us know how we are doing, you can complete an electronic Customer Service Survey from our web site at:

http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey. Alternatively, you may contact us and request a paper copy of the survey that you may complete and return to us by mail or fax. Thank you for taking the time to complete the survey, we appreciate your feedback.

Sincerely,

Katie L. Otanez
Project Manager
Regulatory Office

Copy Furnished:
EGLE, Kalamazoo District Office
USACE, Grand Haven Field Office

William Ballard, AICP
Mead & Hunt, Inc.
2605 Portage Lansing Road
Lansing, Michigan 48906

May 16, 2019

Dear Mr. Ballard:

Re: Proposed Expansion of the Kalamazoo/Battle Creek International Airport

Thank you for your April 3, 2019 correspondence requesting preliminary review comments related to the proposed airport expansion project. The information provided indicates the Kalamazoo/Battle Creek International Airport is exploring the potential impacts of a 1,150-foot extension of Runway 17/35. Included in the runway extension is the relocation of the existing railroad on the south end of the Airport and property acquisition. As you are aware, the City owns property that will be impacted by the proposed improvements.

The relocation of the existing railroad will require acquisition of city property and the property south to Romence Road as well as property south of Romence Road for railroad right of way. Also, there is an existing 16-inch water main located in an easement along the east side of the railroad and an existing 16-inch water main located in Romence Road. The project will need to provide the necessary casings of the water main and agreements at all of the proposed railroad crossings. If the water main is to be relocated, then new easements/right of way for the relocated water main will be necessary. It is assumed that Romence Road and the existing water main in Romence Road will remain in their current location.

As this project moves forward, further review/discussions regarding acquisition of city-owned property and impact on the existing water main will need to occur.

If you have any questions, please feel free to contact me in the Department of Community Development at (269) 329-4474.

Sincerely,



Christopher Forth, AICP
Deputy Director of Planning, Development and Neighborhood Services

c: Vicki Georgeau, Director of Community Development
Kendra Gwin, Director of Transportation and Utilities
Sherman Potter, City Engineer
Michael West, Senior City Planner



KALAMAZOO COUNTY GOVERNMENT

In the Pursuit of Extraordinary Governance...

May 17, 2019

MEAD & HUNT, Inc.
William Ballard, AICP
2605 Port Lansing Road
Lansing, MI 48906

Re: Your letter of April 3, 2019 regarding the Early Coordination Review of Proposed Improvements at the Kalamazoo/Battle Creek International Airport, Kalamazoo, Michigan

Dear Mr. Ballard,

At its meeting on May 2, 2019 the Kalamazoo Metropolitan County Planning Commission (KMPC) reviewed the materials received from the Detroit Airports District Office regarding the proposed improvements at the Kalamazoo/Battle Creek International Airport. Mr. David Reid, Airport Director, attended the meeting and provided additional insights into the plans to extend the runway and the other improvements.

The KMPC is providing comments to the project as it relates to the following items listed in the letter:

- **KMPC's specific areas of concern/regulatory jurisdiction**

The Kalamazoo County Metropolitan County Planning Commission's (KMPC's) jurisdiction is the County of Kalamazoo, but the local 15 townships, 5 villages and 4 cities in the County all do their respective planning on the local level. The KMPC's role in planning is limited to making recommendations and commenting on the local master plans and land use plans, or amendments to them.

In 2018, the KMPC finalized a Kalamazoo County Master Plan, which inventoried and analyzed the existing local Master Plans, and described common goals and objectives on a countywide basis. The airport was brought up in the County Master Plan as an important resource and part of the transportation network of major highways and local roads, railroads and airplane service that the County has to offer.

The airport is located in the City of Kalamazoo and is surrounded in the west, south and east by the City of Portage. Pavilion and Comstock townships are in close vicinity to the airport. This airport improvement project is a continuation of the already existing land use.

The runway is planned to be extended to the south by 1000 ft, and to the north by 150 ft. The major concern would be any potential adverse effects on the residents who live in the nearby neighborhoods.

Any current noise or other disturbances by the airport are already known. Modern airplanes have a lower noise level than older styles of planes used to have, which should minimize concerns about noise. Making the runway better suited for larger planes may result in fewer arrivals and departures, which should also be a positive development for the residents that live in the vicinity of the airport.

The Environmental Assessment that FAA is working on will provide valuable information and hopefully a solution to any potential adverse noise or other concerns.

- **Specific benefits of the project for your organization or to the public**

The justification statement that was used in the last Airport Master Plan was as follows:

The existing length of the Runway 17/35 was reviewed to determine its adequacy towards meeting the takeoff and landing distance requirements of existing and anticipated aircraft expected to operate at the Airport throughout the planning period (thru 2025). It is recommended that alternatives for additional runway length be developed as the existing runway length constrains the operations of current and future aircraft and limits the Airport's ability to serve the commercial air transportation needs of the region.

The proposed improvements would make the airport better meet the needs of today's and future air transportation. The airport is an important part of the economic development of the region and essential for the activities of local residents and businesses.

- **Any available technical information/data for the project site**

The County Planning Department can provide GIS data as needed for the site, including parcels, 2 ft contours, LiDAR data (2015) and 3 inch resolution orthophotography (2018).

- **Potential mitigation/permitting requirements for project implementation**

NA - The KMCP does not have mitigation/permitting requirements or authority.

KMCPC members look forward to the continued work on the proposed airport improvements and offers its support for the project.

Sincerely,

A handwritten signature in cursive script that reads "Lotta Jarnefelt".

Lotta Jarnefelt
Director, Planning and Development Department; Staff for KMCPC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 20 2019

Ernie Gubry
Federal Aviation Administration
Detroit Airports District Office, DET-ADO-600
11677 South Wayne Road, Suite 107
Romulus, Michigan 48174

REPLY TO THE ATTENTION OF:

**Re: Scoping Comments on the Kalamazoo / Battle Creek International Airport Runway
17/35 Extension Project, Kalamazoo, Michigan**

Dear Mr. Gubry:

The U.S. Environmental Protection Agency received your request for comments to inform development of a Draft Environmental Assessment (EA) for the project referenced above. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Aviation Administration (FAA) is the lead agency under NEPA.

The proposed project would extend Runway 17/35 to accommodate commercial service aircraft and realign a taxiway to correct geometric deficiencies. Please find EPA's scoping recommendations within the enclosed (1) Detailed Scoping Comments and (2) Construction Emission Control Checklist. We offer recommendations on contamination, noise, environmental justice, air quality, resiliency, invasive species, threatened and endangered species, sustainable development, and aquatic resources with the goal of identifying issues and offering solutions early in the planning process. We also aim to assist FAA in efficiently meeting project needs in a manner that protects natural resources and human health.

Thank you for the opportunity to review this project. When the NEPA document becomes available, please send an electronic copy to Jen Blonn Tyler, the lead reviewer for this project, at tyler.jennifer@epa.gov. Ms. Tyler is also available at 312-886-6394.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake".

Kenneth A. Westlake
Deputy Director, Office of Multi-media Programs
Office of the Regional Administrator

Enclosures:

- EPA's Detailed Scoping Comments
- EPA's Construction Emission Control Checklist

CC Via Email:

Dave Reid, Airport Director, Kalamazoo/Battle Creek International Airport
William Ballard, Mead & Hunt, Inc.

Project Description

The scoping notice explains that the proposed 1,150-foot runway extension would provide additional length to accommodate the commercial service aircraft that operate at the Kalamazoo/Battle Creek International Airport (Airport). It's unclear whether the added length would also facilitate larger aircraft, modify flight patterns, or lead to other changes to airport operations. The scoping document also proposes an analysis of lifting/modifying an existing noise curfew for aircraft operations. Modifying the noise curfew could potentially facilitate increases in the number of flights. Such changes may impact on the environment and human health. A complete project description that clearly connects proposed physical and policy changes to operational changes would enable a clear analysis of impacts.

Recommendations for the Environmental Assessment (EA):

- Describe and visually depict the project footprint, including all staging areas.
- Specify the acreages and number of trees that would be cleared and any mitigation to offset impacts, such as planting new trees nearby.
- Describe potential changes to airport operations that could result from the proposed runway extension, alterations to the taxiway, and changes to the noise curfew. Consider associated environmental and health impacts categories, such as air quality and noise levels.

Contamination

The proposed project calls for acquiring lands used for historic railroad operations. Lands used for business purposes may also be acquired. In addition, the Roto Finish Superfund Site is adjacent to the Airport and has known groundwater contamination.¹ For the safety of the public and project construction workers, it is important to investigate possible contamination upfront, use the information to compare project alternatives, and develop measures to avoid, minimize, and mitigate adverse impacts. We also raise these issues now because investigating and addressing potential challenges early in the process can avoid future project delays or accidental exposures or releases.

Recommendations for the EA:

- Disclose the study area used for the analysis of soil and groundwater contamination and provide a rationale to support the study area boundary.
- Discuss whether the proposed project could be impacted by contamination from the adjacent Roto Finish Superfund site. If warranted, consider sampling strategies to address possible concerns and ensure the safety of workers.
- Perform Phase I site assessments. This includes background and historical investigations and preliminary property inspections. For guidance, see ASTM International Standard E1527-13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." Include a map in the EA indicating any potential areas of concern and discuss findings.

¹ <https://cumulis.epa.gov/superpad/cursites/csinfo.cfm?id=0502255>

- Consider whether conducting Phase II investigations early in the process at key locations where contamination is suspected would benefit the project's timeline. Phase II assessments include sampling activities to identify the types and concentrations of contaminants and the areas of contamination. If Phase II assessments are conducted, summarize findings in the EA.
- Describe any plans for future soil and groundwater testing in the EA.
- Describe how contaminated soils would be handled and stored on-site, if applicable. Include details on sampling for contamination and best practices for watering and covering materials for protection from wind and rain.
- Coordinate methodologies and sampling plans with the Michigan Department of Environment, Great Lakes, and Energy, and summarize coordination in the EA.

Noise Impacts

The proposed project could potentially alter noise levels in the surrounding area. EPA's website explains that there are direct links between noise and health.² Upfront assessment of noise impacts could inform alternative selection and mitigation measures, if needed.

Recommendations for the EA:

- Compare noise levels between the no-action alternative and all action alternatives. Indicate the locations and number of residences, business, and other facilities that would be impacted.
- Consider whether any schools, medical facilities, nursing homes, or other facilities with sensitive populations would experience an increase in noise levels. The Kalamazoo Country Day School appears to be the closest school, located approximately 0.30 miles east of the Airport.
- Describe changes that the project team is considering regarding the existing noise curfew.
- Consider opportunities to minimize and mitigate increases in noise levels, if applicable. For example, if the project would have adverse noise impacts, then consider on-site insulation and window treatments at affected buildings, modifying flight patterns, and specifying quieter flight procedures, among other opportunities. While the scale of the airport is different, looking at O'Hare International Airport's noise mitigation procedures and policies may offer relevant best practices.

Environmental Justice (EJ)

Executive Order 12898 directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. EPA's EJSCREEN³ is a publicly available mapping tool designed to screen for potential impacts to communities living with or vulnerable to EJ concerns. EJSCREEN indicates that there may be a high percentage of low-income and minority residents directly east of the Airport. Close collaboration with affected communities is key to minimizing adverse impacts.

² <https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution>

³ EPA's EJSCREEN Environmental Justice and Mapping Tool, available at: <https://www.epa.gov/ejscreen>

Recommendations for the EA:

- Describe community outreach efforts aimed at gaining local input, and specify targeted activities to reach low income and/or minority residents. Describe how input would be used to inform project development.
- Describe existing community characteristics and potential community impacts.
- Identify low income and/or minority populations that may be impacted by the proposed project. Compare percentages of low income and/or minority residents that would be affected to an appropriate reference community to determine whether the project could have disproportionately high and adverse effects. Include clear maps and summary tables.
- Provide specific measures to avoid, minimize, and mitigate any anticipated adverse impacts to communities, if needed. For example, consider policy around the nighttime flight curfew, flight paths, and site-specific noise insulation if the project team identifies disproportionate adverse impacts.

Air Quality

The proposed project would result in emissions from construction equipment. Temporary construction emissions have the potential to impact human health, especially in sensitive populations, such as the elderly, children, and those with impaired respiratory systems. The long-term operational emissions could also potentially change because of this project, depending on how the runway extension would impact operations.

Recommendations for the EA:

- Discuss potential emissions sources from the construction phase of the proposed project. Consider: truck trips, demolition, and use of construction equipment.
- Discuss whether construction emissions could impact nearby people. If so, consider potential local health effects from construction emissions, including childhood asthma and other respiratory illnesses that can be triggered by short-term elevated emission levels.
- Identify and commit to specific measures to reduce construction emissions. Options include: (1) requiring dust suppressant strategies, such as use of tarps and watering soils, (2) limiting idling time limits for construction trucks and heavy equipment, and (3) soliciting bids that require zero-emission technologies or advanced emission control systems. See additional best practices in the enclosed Construction Emission Control Checklist.
- Analyze long-term operational emissions at the Airport. Consider any potential changes to the types of aircraft that would use the Airport following the runway extension, changes in the frequency of flights if the noise curfew is lifted or modified, and changes to airport taxing time.
- Consider measures to minimize operational emissions, such as electrified ground support equipment.
- Demonstrate that proposed project would comply with Clean Air Act General Conformity requirements.

Resiliency

The National Climate Assessment⁴ finds that in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure.

Recommendations for the EA:

- Include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area, including its long-term infrastructure. This could help inform the development of measures to improve the resilience of the proposed project.
- Consider resiliency and adaptation measures or plans to ensure that the runway and taxiways would maintain their structural integrity and safe operating conditions under changing heat and precipitation conditions. For example, consider recent trends and anticipated future frequencies of severe precipitation events when sizing stormwater control features. Green infrastructure features, such as permeable pavements, may also help manage stormwater without attracting wildlife. Bioswales and raingardens may be appropriate further from the runway. See EPA's Adaptation Resource Center⁵ for assistance.

Native and Invasive Plant Species

Executive Order 13112 on Invasive Species calls for the restoration of native plant and tree species. The proposed project could introduce non-native invasive plant species. Early recognition and control of infestations is essential to stopping the spread of invasive plants and avoiding future widespread use of herbicides, which could have adverse impacts on biodiversity and water quality.

Recommendations for the EA:

- Describe how the project would meet the requirements of Executive Order 13112.
- Revegetate all disturbed green spaces after the project is complete. Use native species whenever feasible, with consideration of airport-specific needs to not attract wildlife.
- Commit to airport-appropriate best practices to create pollinator friendly habitat, in line with the 2014 Presidential Memorandum entitled, "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators."⁶

Threatened and Endangered Species Impacts

The proposed action calls for removing trees, which could impact species. Section 7 of the Endangered Species Act (ESA) directs all federal agencies to ensure that any action they authorize, fund, or carry-out does not jeopardize the continued existence of a threatened or endangered species or proposed or designated critical habitat. Implementing regulations found at 50 CFR Part 402 specify how federal agencies are to fulfill their ESA Section 7 consultation requirements.

⁴ U.S. Global Change Research Program, 2017 Climate Science Special Report: Fourth National Climate Assessment, Volume 1, available at: <https://www.globalchange.gov/browse/reports>

⁵ EPA's Climate Adaptation Resource Center, available at: <https://www.epa.gov/arc-x>

⁶ "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators" Presidential Memorandum is available at: www.whitehouse.gov/briefing-room/presidentialactions/presidential-memoranda

Recommendations for the EA:

- Use the U.S. Fish and Wildlife Service (FWS) “Information for Planning and Conservation” tool to obtain a list of trust resources in the project area. The list would include species that are threatened or endangered under ESA, candidate species for listing, critical habitat, and migratory birds protected under the Migratory Bird Treaty Act.⁷
- Determine whether the proposed action may affect trust resources. If trust resources may be affected, engage in consultation with FWS. Document coordination and formal consultation in the EA with the goal of aligning NEPA and ESA Section 7 consultation processes.
- Coordinate with the Michigan Department of Natural Resources to determine whether any state-listed species could be impacted by the proposed project, and document coordination in the EA.

Sustainable Development

We encourage implementation of sustainable designs and practices, which can reduce the environmental impact of the proposed actions, increase the project’s resiliency to changing climate conditions, and may have economic benefits. For example, energy efficient lighting results in long-term cost savings.

Recommendations for the EA:

- Discuss specific energy conservation and sustainability best practices that would be incorporated into the project.
- Consider developing an Airport Sustainability Plan, if the Airport does not already have one. FAA can support such plans at eligible airports with their Airport Improvement Program grant funds. Program details and example Sustainability Plans are available on FAA’s website.⁸
- Consider FAA’s Technical Guidance for Evaluating and Selecting Solar Technologies on Airports.⁹
- Commit to recycle construction and demolition debris.
- Consider replacing raw materials with recycled materials for infrastructure components.

Aquatic Resources

If aquatic resources are present in the project area, it is important for direct and indirect impacts to be assessed in the NEPA document to inform decision-making.

Recommendations for the EA:

- Describe whether aquatic resources are present within or adjacent to the proposed project and whether they may be impacted. Consider the proposed alignment for rerouting the railroad when conducting the analysis.

⁷ FWS Information for Planning and Conservation (IPaC) tool is available at: <https://ecos.fws.gov/ipac/>

⁸ For details on Airport Sustainability Plans and FAA’s Airport Improvement Program, see <https://www.faa.gov/airports/environmental/sustainability/>

⁹ FAA’s “Technical Guidance for Evaluating and Selecting Solar Technologies on Airports” is available at: <https://www.faa.gov/airports/environmental/>

- If applicable, include a robust discussion on the Clean Water Act (CWA) Section 401 water quality certification and Section 404 permitting requirements for dredging and filling of jurisdictional Waters (Waters) of the United States.
- If applicable, discuss efforts that the project team has taken or will take to first avoid and then minimize potential impacts to Waters, in line with the CWA Section 404(b)(1) Guidelines.
- If applicable, discuss how cost, logistical, or technological constraints preclude avoidance and minimization of any known impacts to Waters.
- If applicable, discuss proposed mitigation types, ratios, and potential locations. Include mitigation sequencing per the CWA Section 404(b)(1) Guidelines and describe how mitigation would comply with the 2008 Mitigation Rule.

U.S. Environmental Protection Agency
Construction Emission Control Checklist

Consider measures that apply to the proposed project from the following list.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).¹⁰
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).¹¹
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the U.S. EPA Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where possible.¹²
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).

Fugitive Dust Source Controls

¹⁰ <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

¹¹ <http://www.epa.gov/otaq/standards/nonroad/nonroadci.htm>

¹² <http://www.epa.gov/otaq/standards/nonroad/locomotives.htm>

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.

William Ballard

From: Gubry, Ernest (FAA) <Ernest.Gubry@faa.gov>
Sent: Friday, June 7, 2019 3:59 PM
To: William Ballard
Cc: Gubry, Ernest (FAA)
Subject: FW: Early Coordination Kalamazoo/Battle Creek International Airport

Ernest P. Gubry
FAA DETADO
(734) 229-2905

From: Ihnken, Matthew <matthew_ihnken@fws.gov>
Sent: Thursday, May 30, 2019 9:09 AM
To: william.ballard@meadhunt.com
Cc: Gubry, Ernest (FAA) <Ernest.Gubry@faa.gov>; Kennedy, Daniel (DNR) <KENNEDYD@michigan.gov>
Subject: Early Coordination Kalamazoo/Battle Creek International Airport

Mr. Ballard,

The Service has received your request for early coordination for the proposed Kalamazoo/Battle Creek International Airport expansion. These comments are provided pursuant to the Endangered Species Act (ESA) (87 Stat. 884; 16 U.S.C. 1531 et seq.).

This project area falls within the range of the endangered Indiana bat (*Myotis sodalis*) and the threatened northern long-eared bat (*Myotis septentrionalis*). If suitable habitat for listed bat species is proposed to be removed as a part of the preferred alternative then consultation under section 7 of the ESA is necessary prior tree clearing activities.

Trees should be considered suitable habitat for bats if they are greater than 3 inches in diameter and within 1000 feet of any contiguous block of trees that is 10 or more acres.

We appreciate the opportunity to provide comments on this project. If you have any questions regarding these comments, please contact me by email or at the contact info below.

Sincerely,

Matt Ihnken, CWB®
Fish & Wildlife Biologist
Transportation Liaison

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