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## **Appendix P – Public and Agency Review of the Draft EA**

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This appendix (Appendix P) includes details on the Public Hearing held March 11, 2024. This appendix also provides a summary of the public and agency involvement activities including comments and Kalamazoo/Battle Creek International Airport (Airport) responses on the 2023 Draft Environmental Assessment (EA).

## 1. Public Hearing Details

A Public Hearing was held at the Air Zoo Aerospace & Science Museum (approximately 1.2 miles from the Airport) on March 11, 2024 from 5:30 PM to 7:30 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 present to record verbal comments from the public. Public comments received have been incorporated into the EA where appropriate.

The Public Hearing was an informal, walk-through event where individuals had the opportunity to review maps and displays, ask questions, give feedback, and discuss the project with Airport staff and consultant team members. 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 29 people attended the Public Hearing. Copies of the legal public notice and sign-in sheets are found at the end of this document.

The legal public notice was advertised in a local newspaper 30 days before the Public Hearing. The public notice explained that the Draft EA was available for public review and announced the date, time, and location of the Public Hearing. The Draft EA document was available for public review and comment 30 days prior to the Public Hearing and 30 days after the meeting was held.

Physical copies of the Draft EA document were available for public review at the Airport during normal business hours and an electronic copy was also available on the Airport's website.

## 2. Summary of Public Comments Received and Airport Responses

No attendees at the Public Hearing left comments with the Court Reporter. Three written comments were received. Their comments are summarized below. Actual written comments are included at the end of this appendix.

### Megan Burtzloff

1. *Note trees recently planted by Foundation for Excellence. FFE Kalamazoo made an assessment of existing trees on the city easements and selected trees that mixed well with existing and fit well. The new trees planted are a nice variety. FFE may be a good resource when selecting trees that need to be planted street-side.*
2. *Any trees not replaced (at homeowners' request) may they be planted in Emerald Park?*
3. *1804 Banbury is listed with previous homeowner (Randy). Current homeowner Roy Donald Elaman (my dad) and Elaine Elaman. 269-501-8130. Please update your contact information as their trees are impacted.*

**Response:** Comments noted. Specifics of tree varieties and planting locations will be discussed/decided during meetings with impacted property owners. Consideration will be

given to planting unwanted trees in the Emerald Park but is not guaranteed and subject to FAA regulations. Contact information will be updated.

Jonathan Lam

- *100% on board!*
- *Waiting a long time for this*
- *Would be awesome to include an airport observation park – picnic tables, small playground – have seen at other airports.*
- *Any chance we can get “the street” taxiway a real name like taxiway “Zulu?” It runs off of Bravo to T hangars.*
- *Thanks for the opportunity!*

**Response:** Comments noted. The request for an observation park and other development items will be passed to the Airport for consideration; however, the request is at the discretion of the Airport and FAA guidelines. The request is not guaranteed.

David Staiger

*I am writing to oppose the proposed runway expansion at the Kalamazoo/Battle Creek International Airport.*

*While the project seems to be very well thought out concerning details and local immediate impact to our community, I believe it completely misses the bigger picture and long-term environmental consequences. At a time when climate change is more rapidly increasing and the probability of severe weather events is also accelerating, expanding air travel capacity is a move in the wrong direction.*

*According to [davidsuzuki.org](http://davidsuzuki.org): Flights are energy-intensive and depend on fossil fuels. Subsidies from fuel taxes give the airline industry an unfair advantage over other transportation modes. Consumers don't see the true environmental costs of their air travel because low flight prices don't reflect their environmental impact. Emissions from flights stay in the atmosphere and will warm it for several centuries. Because aircraft emissions are released high in the atmosphere, they have a potent climate impact, triggering chemical reactions and atmospheric effects that heat the planet.*

*While many sectors are beginning to reduce their emissions, aviation's have continued to grow. Carbon emissions from the airline industry grew by 75 per cent from 1990 to 2012. It's expected they will continue to grow rapidly until 2050. If left unchecked, they could consume a full quarter of the available carbon budget for limiting temperature rise to 1.5 C.*

*In the choices and decisions we make concerning climate change, we are all either part of the problem or part of the solution. Rather than expanding the airport, we should be putting time and resources into more energy efficient mass transit such as electric trains and buses, I call upon county and federal officials to stop this project and instead pursue projects that work to mitigate climate change rather than exacerbate it.*

**Response:** Comments noted. The US Environmental Protection Agency regulates air quality under the Clean Air Act (CAA) described in 42 U.S.C. §§ 7401- 7671q. These regulations are to hold pollutants to permissible levels via standards called National Ambient Air Quality Standards (NAAQS). These standards are designed to protect public health and welfare. Criteria pollutants included in the NAAQS are carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), particulate matter 2.5 (PM<sub>2.5</sub>), particulate matter 10 (PM<sub>10</sub>), and sulfur dioxide (SO<sub>2</sub>).

The 2023 Draft EA included an air quality analysis to assess the potential impacts of the proposed project on air quality. The air quality analysis measured the condition of the air in terms of pollutant concentrations for critical pollutants for both construction emissions and operational emissions.

The evaluation found that a slight increase in emissions associated with aircraft operations may occur but did not exceed CAA defined de minimis thresholds, and therefore are not anticipated to significantly change existing air quality. All pollutants were within their permissible levels according to the NAAQS.

### **3. Summary of Agency Comments Received and Airport Responses**

Correspondence from four agencies was received on the 2023 Draft EA. A summary of their comments and Airport responses are included below. Actual correspondence letters received are provided later in this appendix.

#### **Michigan Department of Natural Resources**

- *Michigan Department of Natural Resources, Wildlife Division, has no comments to provide for this proposal.*

**Response:** Comment noted.

#### **Michigan Department of Environment, Great Lakes, and Energy**

- *Michigan Department of Environment, Great Lakes, and Energy (EGLE) has completed your July 18, 2023, request for comment regarding the Draft Environmental Assessment (EA) for the proposed runway addition for the Kalamazoo/Battle Creek International Airport. The EA has evaluated potential impacts of the project and alternatives. EGLE has the following comments:*
  1. *The alternative with the least number of impacts should be chosen unless it can be demonstrated why the alternative is not feasible or prudent. If impacts cannot be avoided, then they should be minimized to the greatest extent possible. When applying for permits, an alternatives analysis should consider whether the proposed impacts, such as the tree clearing, can be reduced to the greatest extent possible. Cumulative impacts from this project and others in the area will also be considered.*
  2. *Any unavoidable impacts to regulated wetlands will require a permit under Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Before applying for permits, all potential wetlands within project area should be delineated by a professional wetland consultant and then reviewed by EGLE staff*

for verification. Wetland mitigation will likely be required for any unavoidable impacts because of this project.

3. The EA indicates that there are no streams, lakes, or floodplains within the proposed project area. Therefore, no permits will be required under Part 301, Inland Lakes and Streams, or the Floodplain Regulatory Authority of Part 31, Water Resources, of the NREPA.
4. A review of our database indicates no occurrences of state and/or federal threatened and endangered species in the project location. However, your project location is within the range of the Northern-Long Bat and Indiana Bat, which are listed as Endangered Species. The Michigan Department of Natural Resources (MDNR) is responsible for the protection of state endangered and threatened species under NREPA. It is recommended to consult with MDNR regarding state-listed threatened or endangered species and any potential impacts.

**Response:** Comments noted. All permitting requirements will be met prior to impacting any regulated resource. The above-mentioned agency coordination and analysis was completed during the development of the EA. As the project progresses, guidance and coordination referenced above will continue as needed.

### **United States Environmental Protection Agency**

#### ***Purpose and Need / Project Alternatives***

The Draft EA indicates the existing 6,502-foot long Runway 17/35 is inadequate for many commercial service and business jet aircraft to operate at their maximum gross takeoff weight. When evaluating the runway length needs of current air aircraft operating at the Airport, critical aircraft have the most demanding runway length needs of 7,500 feet. However, the Draft EA indicates that, when evaluating the runway length needs of general aviation jet aircraft that currently operate at the Airport, a runway length of 8,125 feet for takeoff is more appropriate based on the 90 percent useful load performance curve. In addition, operation by this critical aircraft category that require between 7,000 and 8,000 feet of runway length are expected to increase.

#### ***Recommendations for FAA before finalizing the National Environmental Policy Act (NEPA) document:***

- Explain why the proposed extension of 1,150 feet, which will result in a total runway length of 7,650 feet, will be adequate versus the identified needs of 8,000 feet or 8,125 feet for general aviation jet aircraft.

**Response:** An exhaustive analysis of runway lengths was completed as part of the EA project. It was determined a runway length of 7,650 feet was adequate to meet the needs of current and future air carrier operators and most of the general aviation jet aircraft. Although a longer runway length was desired, such as 8,000 feet or 8,125 feet, the environmental and community impacts were deemed too great and a lesser runway length (7,650 feet) was selected as the Preferred Alternative.

- Explain how the extension lengths of 150 feet (Runway 17 end) and 1,000 feet (Runway 35 end) were chosen. Consider that extending Runway 17/35 solely to the south along

*Runway 35 would eliminate impacts to the north. The Draft EA mentions that a runway extension to the north would introduce both Interstate 94 and Romence Road into the Runway Protection Zone (RPZ). These are both incompatible land uses. Additionally, tree obstructions would need to be removed from the Bloomfield Subdivision Historic District (Historic District) if the runway is extended to the north.*

**Response:** The intersection of Taxiway C and Runway 17 has a history of runway incursions and needs to be reconfigured to provide taxiway geometry that meets FAA design criteria. In order to correct airfield geometry deficiencies, Runway 17 must be extended to the north 150 feet to provide enough pavement to realign the intersection of Taxiway C with Runway 17.

Given the need for a total runway length of 7,650 feet, the remaining 1,000 feet was extended to the south away from residential and community areas toward commercial and industrial land uses.

### **Noise**

*The cumulative impacts analysis indicates the Airport is considering removing the existing noise curfew. The Draft EA does not indicate when a decision regarding the curfew will be made and what FAA's role will be in revising, and potentially removing, the existing noise curfew.*

#### **Recommendations for FAA before finalizing the NEPA document:**

- *Discuss whether revising the existing noise curfew is part of the proposed project.*
- *Explain FAA's role in revising the existing noise curfew.*
- *Describe how air traffic at the Airport will change with the revised noise curfew (e.g., number of flights during nighttime hours, etc.)*
- *Discuss how a revised noise curfew would comply with existing state and local noise policies, if applicable.*
- *Analyze noise impacts to the Historic District and businesses as a result of a revised noise curfew.*

**Response:** The Airport is no longer considering removing the noise curfew in the foreseeable future. However, the FAA has determined the removal of the noise curfew is not a federal action and is not subject to NEPA. If the Airport does initiate the process to remove the noise curfew in the future, it will be considered a local action subject to local zoning and administrative rules.

### **Construction**

*EPA acknowledges that the Draft EA references EPA's Construction Emission Control Checklist (Checklist).*

#### **Recommendations for FAA before finalizing the NEPA document:**

- *Require the Airport and project contractors to implement measures from the Checklist, to the extent practicable, in addition to the requirements from FAA's advisory circulars and construction guidelines.*

**Response:** Comment noted. The EA currently states the Construction Emission Control Checklist should be considered where feasible and that the Airport must follow FAA advisory circulars construction guidelines. The EA also states that construction contracts will include any applicable requirements that contractors must follow.

### **Project Features**

*The existing Norfolk Southern rail line would fall within the shifted RPZ under the proposed alternative, resulting in a required rail relocation.*

#### **Recommendations for FAA before finalizing the NEPA document:**

- *Discuss the rail line length that will need to be relocated under the proposed alternative.*
- *Discuss how train traffic will be impacted during and after construction of the new rail spur under the proposed alternative.*

**Response:** Approximately 5,000 feet of rail line will be relocated outside of the future Runway Protection Zone of the extension of Runway 35. During final design, coordination with Norfolk Southern will occur to incorporate their operational design and safety standards.

### **Historic, Architectural, Archaeological, and Cultural Resources**

*The proposed project includes the removal or partial removal (tree trimming) of select mature trees within the Historic District. Figure 3.7 - Historic District Area of Potential Effect indicates which parcels currently have trees deemed to be obstructions to the departure surface under the proposed alternative. In a Memorandum of Agreement between FAA, the State Historic Protection Office and the Airport indicates that a tree-for-tree replacement program is proposed. Existing trees will be removed and replaced and replanted with species that grow to shorter heights.*

#### **Recommendations for FAA before finalizing the NEPA document:**

- *Quantify the acreage of mature tree obstructions proposed for removal under the Preferred Alternative.*
- *When reviewing Figure 3.7, EPA notes that not all trees have been marked for removal. Discuss why some trees under the departure surface would not be removed at this time (e.g., will some trees be trimmed in the future, etc.).*
- *Commit to planting only native tree species as replacements.*
- *Provide additional information on how nearby homeowners will be advised regarding proper maintenance of tree replacements.*
- *Commit to monitoring the replacement trees for a period of one to three years and replace any trees that die during this period.*

**Response:** It is impossible to quantify the acreage of tree removals as trees identified as obstructions are sporadic and scattered throughout the Milwood neighborhood. Trees not marked for removal are not considered current obstructions to the departure surface of Runway 17/35 but may be removed if the property owners so desires.

All trees used as replacements will be of a low growing variety as to not become obstructions in the future. As many native trees have the potential to become future obstructions because of their height at maturity, low growing ornamental trees are typically provided as replacement planting options. The type of trees used as replacements on private property will be selected through coordination with the individual property owners. A list of generally approved species will be provided, however, an owner is not required to adhere to the list, so long as the species is a low growing variety. As most replacements will occur on private property, the desires of the property owners will be taken into consideration.

Maintenance and monitoring within the road rights-of-way will be the responsibility of the Airport due to the requirements of the MOA. Maintenance and monitoring on private parcels is the responsibility of the property owners since compensation is provided to the owners for mitigation, which they implement at their discretion.

#### **City of Portage Department of Community Development**

1. *In general, regardless of the selected alternative, the City requests to be consulted before any Runway Protection Zone (RPZ) modifications, or other restrictive elements are put in place affecting the City's public right of way. The City has the right to review and approve any restrictions or modifications proposed for the public right of way.*
2. *Any modification of Romence Road required for the proposed RPZ is expected to be funded as part of the Airport project and is subject to review and approval by the City of Portage.*
3. *The City has the right to review and approve the proposed relocation and potential undergrounding of existing overhead power lines in the public right of way on the north side of Romence Road.*
4. *A pedestrian trail is planned on the north side of Romence Road to interconnect with the City's existing trail network. Any avigation easement for an RPZ encroaching on the public right of way should not prohibit the construction of this trail.*
5. *Any modification to the railroad grade crossing at Romence Road is subject to review and approval by the City. Coordination with the County Road Commission will be required should the location affect the traffic signal at the Sprinkle Road intersection. A pre-track signal may be required based on the final location of the relocated crossing.*
6. *There is an existing 16" water main owned by the City of Portage along the east side of the existing railroad track. Should any modification of the track alignment be required, the project will need to properly address this (i.e. casing the water main) as part of the airport project. Any property modifications affecting the water main will need to ensure the City's access and rights to the main are preserved through an easement, either new or existing as required.*

**Response:** Comments noted. All the above requirements will be addressed and incorporated into final design as applicable.



State of Michigan,) ss  
County of Kalamazoo)

Nancy Bloch being duly sworn, deposes that he/she is principal clerk of MLive Media Group; that Kalamazoo Gazette is a public newspaper published in the city of Kalamazoo, with general circulation in Kalamazoo county, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Kalamazoo Gazette 01/28/2024

*Nancy Bloch*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 29th day of January 2024

*Teasha R Payne*

Notary Public

TEASHA R. PAYNE  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF MECOSTA  
COMMISSION EXP FEB 24 2026  
ACTING IN COUNTY OF hent

**NOTICE OF AVAILABILITY OF  
A  
DRAFT ENVIRONMENTAL  
ASSESSMENT AND  
NOTICE OF A PUBLIC  
HEARING FOR  
PROPOSED IMPROVEMENTS  
AT THE  
KALAMAZOO/BATTLE CREEK  
INTERNATIONAL AIRPORT  
KALAMAZOO, MICHIGAN**

ALL INTERESTED PERSONS are notified of the availability of the Draft Environmental Assessment (EA) evaluating the potential effects of proposed improvements at the Kalamazoo/Battle Creek International Airport (Airport) in compliance with applicable laws, regulations, Executive Orders, and FAA policies including Order 1050.1F. A hardcopy of the Draft EA is available for review during normal business hours at the Airport or an electronic version is available anytime online on the Airport's website until March 27, 2024. Documents can be found at the following locations:

- A hardcopy is available at the Airport located at 5235 Portage Road, Kalamazoo, MI 49002
- An electronic version is available online at: <https://flyazo.com/about-the-airport/documents-plans-projects-reports/airport-projects/>

ALL INTERESTED PERSONS are further advised of a public hearing being held by the Airport. The purpose of the public hearing will be to consider the social, economic, and environmental effects of the proposed improvements and whether the improvements are in the public interest and consistent with the National Environmental Policy Act of 1969. The public hearing is scheduled for:  
• March 11, 2024 from 5:30 PM to 7:30 PM at the Air Zoo Aerospace & Science Museum located at 6151 Portage Rd, Portage, MI 49002

The public hearing will focus

- The public hearing will focus on the Draft Environmental Assessment for the following proposed improvements:
- Extend Runway 17 by 150 feet (north end) and extend Runway 35 by 1,000 feet (south end)
- Realign Taxiway C at the approach end of Runway 17
- Extend parallel Taxiway B to match the Runway 17/35 extension
- Relocate an existing railroad spur on the south end of the Airport, including land acquisition
- Obstruction clearing in both Runway 17 and Runway 35 approaches
- Preliminary aviation easements/land acquisition in both Runway 17 and Runway 35 approaches
- Relocate existing navigational aids
- Development of new approach procedures for Runway 17/35 to AC 150/5300-18B Standards
- Independent noise analysis to examine the need/removal of the existing noise curfew

The public hearing will be an open house format with no formal presentation given. Members from the project team will be available to answer questions on an individual basis. Interested participants may attend the meeting anytime between the listed hours. A court reporter and comment forms will be available for those persons who would like to make a statement regarding the project, and have it included in the official transcript of the public hearing. Before including personal identifying information in your comment, be advised that your entire comment including your personal identifying information, may be made publicly available at any time.

As part of the project, the State Historic Preservation Office determined that the Bloomfield Subdivision within the Millwood Neighborhood was eligible for listing

in the National Register of Historic Places as a historic district. Required tree removals in the Millwood Neighborhood will result in an adverse effect to the eligible historic district. As a result, a final Section 106 Memorandum of Agreement to mitigate potential impacts to the historic district and a Section 4(f) Evaluation were developed, and both are included as a part of the Draft EA.

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during the meeting should notify Craig Williams, Airport Director at least three days prior to the meeting.

The public is also encouraged to submit written comments or concerns by mail or email. Comments must be received by March 27, 2024 to be included in the project record. Send comments to:

Craig Williams, AAE,  
Airport Director  
5235 Portage Road,  
Kalamazoo, MI 49002  
Phone - (269) 388-3668 /  
Email - cawill@kalcounty.com



KALAMAZOO BATTLE CREEK  
INTERNATIONAL AIRPORT

Kalamazoo/Battle Creek International Airport  
Environmental Assessment Public Hearing  
March 11, 2024  
Sign-in Sheet

Name	Address	E-mail	Phone Number
David A Smith	1927 Barbary	tophat5678@charter.net	
Beth Moberger	7000 Post Road J	atlethebus99@hotmail.com	616-573-7131
Mike Dubatin	1812 NOTTINGHAM AVE	WJDUGGAN59@GMAIL.COM	269-929-6080
Drew Chlouber	10713 South Westlake		269 8238650
Dave & Toni Burkett	2134 Lukoway		269 342-6423
DENNIS LASKOWSKI	1814 THRUWOOD	d1234@701.com	269 501 4883
Syzy Pearson	3004 East Shore Dr.		
Karl Beyzigel	6200 Tunder Bluff		269-370-7675
Amanda Multen	1940 Royce Ave	amanda.multen@gmail.com	
Dustin McLen	1421 Larra Rd	Cinder286@outlook.com	313-820-6236
Julie Ringlever	7000 Portage Rd	julie.ringlever@pfizer.com	269 823.4941



**KALAMAZOO BATTLE CREEK  
INTERNATIONAL AIRPORT**

**Kalamazoo/Battle Creek International Airport  
Environmental Assessment Public Hearing  
March 11, 2024  
Sign-in Sheet**

Name	Address	E-mail	Phone Number
MATT MATISON	418 HOMECAST AVE KAL MI 49001		269-594-6657
Alex DeHaan			269-501-6457
HENRY BALKEMA			269-209-3931
Dan Herschberger	1930 Golfview Ave	lherschberger@gmail.com	269-251-4553
Zach Young	1621 Roseland Ave Kalamazoo	ZYoung47@gmail.com	5143773787
Robert Reed	1966 Frye Ave Kalam		<del>269</del> 269-224-7822
Shawn Van Edmond	7939 NW112 AVE	SRVE@AET.NET	
Michael Lunn	6733 Marlow 49024	michael@TheLunnys.net	269-267-9885
Raymond & MESA N Burteloff	2135 WADSWORTH RD 49001		



**KALAMAZOO BATTLE CREEK  
INTERNATIONAL AIRPORT**

**Kalamazoo/Battle Creek International Airport  
Environmental Assessment Public Hearing  
March 11, 2024  
Sign-in Sheet**

Name	Address	E-mail	Phone Number
Laurie Young	1621 Rosston Ave	dclausho7@gmail.com	517-581-9677
Nicole Miller	2972 Woodlawn Dr.	nikkic@meadandhunt.com	269-998-8587
J. Atchinson			616-227-0777
Josh Manning	6795 Tell Oaks Dr.		539-305-4909



**KALAMAZOO BATTLE CREEK  
INTERNATIONAL AIRPORT**

**Kalamazoo/Battle Creek International Airport  
Environmental Assessment Public Hearing  
March 11, 2024  
Sign-in Sheet**

Name	Address	E-mail	Phone Number
Catherine Seno	1933 Royce Avenue	CatherineS1712@gmail.com	(224) 305-9555
Benn Rentz	10841 S. Westredge Ave	bennrentz@gmail.com	(517) 574-3001
David Staiger	1928 La Kenny Ave	dave.staiger@gmail.com	269-548-8919
Jonathan Lam	8321 South 24th St	jwilson55@icloud.com	2698234349
Hannah Hudson	6795 Tall Oaks Dr Kees		586219 8451

# Comment Form

## Public Hearing – March 11, 2024

Please use this form to submit comments regarding the Environmental Assessment and future development at the Kalamazoo/Battle Creek International Airport.

Please drop this form in the comment box or return by one of the methods listed below by March 27, 2024:

**E-mail:** Send a scanned copy of the form to Craig Williams at [cawill@kalcounty.com](mailto:cawill@kalcounty.com)

**Mail:** Mail this sheet to the following address:

Craig Williams, AAE  
Airport Director  
5235 Portage Rd.  
Kalamazoo, MI 49002

Are you a member of the public  or a tenant of the Airport? \_\_\_\_\_

Name: MEGAN BURTZLOFF

Organization: \_\_\_\_\_

Address: 2135 PADDINGTON RD.

Telephone: 269-532-2564 E-Mail: megan4design@gmail.com

Comments: \_\_\_\_\_

① Note trees recently planted by Foundation for Excellence FFE Kalamazoo made an assessment of existing trees on the city easements and selected trees that mixed well with existing and fit well. The new trees planted are a nice variety. FFE may be a good resource when selecting trees that need to be planted street-side.

② Any trees not replaced (at homeowners' request) may they be planted in Emerald Park?

③ Be advised that your entire comment including your personal identifying information, may be made publicly available at any time.

(Please attach an additional sheet or use back of form if necessary.)

1804 Barbary is listed with previous homeowner (Randy). Current homeowner:

Roy Donald Elaman & Elaine Elaman

269-501-8130. Please update your contact information as their trees are impacted.

My dad 😊

# Comment Form

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Please use this form to submit comments regarding the Environmental Assessment and future development at the Kalamazoo/Battle Creek International Airport.

Please drop this form in the comment box or return by one of the methods listed below by March 27, 2024:

**E-mail:** Send a scanned copy of the form to Craig Williams at [cawill@kalcounty.com](mailto:cawill@kalcounty.com)

**Mail:** Mail this sheet to the following address:

Craig Williams, AAE  
Airport Director  
5235 Portage Rd.  
Kalamazoo, MI 49002

Are you a member of the public \_\_\_\_\_ or a tenant of the Airport? Both

Name: Jonathan Lam

Organization: \_\_\_\_\_

Address: 8161 South 24<sup>th</sup> St Kzo 49048

Telephone: 269-823-4349 E-Mail: jwlam55@icloud.com

Comments: \_\_\_\_\_

- 100% on board!
- Waiting a long time for this
- Would be awesome to include an aircraft observation park - picnic tables small playground - have seen it at other airports
- Any chance we can get "the street" taxiing a real name like taxiing "Zulu"?  
It run off of Boro to T hangers

Thank for the opportunity! JL

Be advised that your entire comment including your personal identifying information, may be made publicly available at any time.

(Please attach an additional sheet or use back of form if necessary.)



**From:** [William Ballard](#)  
**To:** [Courtney Beard](#)  
**Subject:** FW: Airport Runway Expansion Project Public Comments  
**Date:** Thursday, March 28, 2024 2:02:39 PM  
**Attachments:** [MeadHuntlogo\\_87950253-989c-49b2-a74f-a156c21c38dd.png](#)

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Please add to the AZO public comments.

**Bill Ballard, AICP**

Project Manager | Aviation  
Direct: 517-908-3105 | Cell: 989-640-1060 | Transfer Files

**Mead&Hunt**

[LinkedIn](#) | [Facebook](#) | [Instagram](#)

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**From:** Craig A. Williams <cawill@kalcounty.com>  
**Sent:** Thursday, March 28, 2024 1:55 PM  
**To:** Eric A. Bjorkman <eabjor@kalcounty.com>; William Ballard <william.ballard@meadhunt.com>  
**Subject:** Fwd: Airport Runway Expansion Project Public Comments

Craig Williams, AAE  
Airport Director  
Kalamazoo/Battle Creek Int'l Airport

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**From:** Dave S <davestaiger@gmail.com>  
**Sent:** Thursday, March 28, 2024 12:08 PM  
**To:** Craig A. Williams <cawill@kalcounty.com>  
**Subject:** Airport Runway Expansion Project Public Comments

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

To Whom It May Concern:

Please accept the comments below as there was a typo in the March 11th Environmental Assessment Public Hearing brochure that said that comments would be accepted "no later than Friday, March 27th, 2024," Also, verbally I was told at the March 11th Public Hearing that we had until the end of March.

I am writing to oppose the proposed runway expansion at the

Kalamazoo/Battle Creek International Airport.

While the project seems to be very well thought out concerning details and local immediate impact to our community, I believe it completely misses the bigger picture and long-term environmental consequences.

At a time when climate change is more rapidly increasing and the probability of severe weather events is also accelerating, expanding air travel capacity is a move in the wrong direction.

According to [davidsuzuki.org](http://davidsuzuki.org):

*Flights are energy-intensive and depend on fossil fuels. Subsidies from fuel taxes give the airline industry an unfair advantage over other transportation modes. Consumers don't see the true environmental costs of their air travel because low flight prices don't reflect their environmental impact. Emissions from flights stay in the atmosphere and will warm it for several centuries. Because aircraft emissions are released high in the atmosphere, they have a potent climate impact, triggering chemical reactions and atmospheric effects that heat the planet.*

*While many sectors are beginning to reduce their emissions, aviation's have continued to grow. Carbon emissions from the airline industry grew by 75 per cent from 1990 to 2012. It's expected they will continue to grow rapidly until 2050. If left unchecked, they could consume a full quarter of the available carbon budget for limiting temperature rise to 1.5 C.*

In the choices and decisions we make concerning climate change, we are all either part of the problem or part of the solution. Rather than expanding the airport, we should be putting time and resources into more energy efficient mass transit such as electric trains and buses, I call upon county and federal officials to stop this project and instead pursue projects that work to mitigate climate change rather than exacerbate it.

Sincerely,

David Staiger

**1928 Lakeway Ave.**

**Kalamazoo, MI 49001**

**269-548-8919**

Confidentiality: The information contained in this electronic mail message and any attachments is intended only for the use of the individual or entity to which it is addressed and may contain legally privileged, confidential information or work product. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution, or forwarding of the E-mail message is strictly prohibited. If you have received this message in error, please notify me by E-mail reply, and delete the original message from your system.

The Draft EA was transmitted to the following regulatory agencies. The agencies were afforded approximately 30 days to comment on the document.

Salutation line	Contact Name	Title	Organization	Address	City, State, Zip	Phone
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	EGLE, Water Resources Division, Transportation Review Unit	525 W Allegan St	Lansing, MI 48933	517-599-9002
Ms. Olanez	Katie Olanez	Project Manager	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. Ihnken	Matt Ihnken	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

**From:** [Mills, Mark \(DNR\)](#)  
**To:** [William Ballard](#)  
**Cc:** [Sadler, Tania \(DNR\)](#); [Wildman, Kristin \(DNR\)](#); [Poppe, Don \(DNR\)](#)  
**Subject:** FW: FOR RESPONSE -- FW: Draft Short Form EA - Kalamazoo/Battle Creek International Airport  
**Date:** Monday, January 29, 2024 1:12:21 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.jpg](#)

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You don't often get email from mills@michigan.gov. [Learn why this is important](#)

Mr. Ballard,  
Michigan Department of Natural Resources, Wildlife Division, has no comments to provide for this proposal.  
Thank you,



Mark Mills  
Southwest Region Manager, Wildlife Division  
Michigan Department of Natural Resources  
269.967.5367 (call/text)  
[Michigan.gov/Wildlife](http://Michigan.gov/Wildlife)

---

**From:** Sadler, Tania (DNR) <SadlerT@michigan.gov>  
**Sent:** Monday, January 29, 2024 11:31 AM  
**To:** Mills, Mark (DNR) <MILLSM@michigan.gov>  
**Cc:** Sadler, Tania (DNR) <SadlerT@michigan.gov>  
**Subject:** FOR RESPONSE -- FW: Draft Short Form EA - Kalamazoo/Battle Creek International Airport

Hi Mark,  
Per Shannon's request, can you please respond to the below request for environmental assessment by the due date of March 8<sup>th</sup>?  
Please cc me or forward your response to me when sent.  
Thank you,  
Tania

**Tania Sadler**  
Executive Assistant to Deputy Directors Shannon Lott and Kristin Phillips  
Michigan Department of Natural Resources  
517-930-4989



---

**From:** Lott, Shannon (DNR) <[LottS1@michigan.gov](mailto:LottS1@michigan.gov)>  
**Sent:** Monday, January 29, 2024 11:27 AM  
**To:** Sadler, Taunia (DNR) <[SadlerT@michigan.gov](mailto:SadlerT@michigan.gov)>  
**Subject:** RE: PENDING -- FW: FOR YOUR REVIEW -- FW: Draft Short Form EA - Kalamazoo/Battle Creek International Airport

Please send to Mark Mills in WLD. thanks

---

**From:** Sadler, Taunia (DNR) <[SadlerT@michigan.gov](mailto:SadlerT@michigan.gov)>  
**Sent:** Friday, January 26, 2024 8:40 AM  
**To:** Lott, Shannon (DNR) <[LottS1@michigan.gov](mailto:LottS1@michigan.gov)>  
**Cc:** Sadler, Taunia (DNR) <[SadlerT@michigan.gov](mailto:SadlerT@michigan.gov)>  
**Subject:** FOR YOUR REVIEW -- FW: Draft Short Form EA - Kalamazoo/Battle Creek International Airport

Please advise appropriate staff to draft a response to the below request for environmental assessment. Thank you.

---

**From:** Hiller, Lindsay (DNR) <[HillerL1@michigan.gov](mailto:HillerL1@michigan.gov)>  
**Sent:** Thursday, January 25, 2024 2:28 PM  
**To:** Sadler, Taunia (DNR) <[SadlerT@michigan.gov](mailto:SadlerT@michigan.gov)>  
**Cc:** Tkaczyk, Judy (DNR) <[TKACZYKJ@michigan.gov](mailto:TKACZYKJ@michigan.gov)>  
**Subject:** Draft Short Form EA - Kalamazoo/Battle Creek International Airport

Hi there!

Please see the draft environmental assessment for the proposed 1,150-foot extension of Runway 17/35 and realignment of Taxiway C at the Kalamazoo/Battle Creek International Airport (Airport) in Kalamazoo that is addressed to Shannon. They are asking for comments to be provided by March 8<sup>th</sup>, 2024.

The document is too large to attach to the email. I could not get the appendices to combine so those are in separate folders. A copy of all documents is located at:

 [https://stateofmichigan-my.sharepoint.com/:f/g/personal/hillerl1\\_michigan\\_gov/EoLnI5I--ABHrYThLz50krUBC5Xw4K0\\_YfJuHXfTVpERMQ?e=hJl3ox](https://stateofmichigan-my.sharepoint.com/:f/g/personal/hillerl1_michigan_gov/EoLnI5I--ABHrYThLz50krUBC5Xw4K0_YfJuHXfTVpERMQ?e=hJl3ox)

Thank you!



## Lindsay Hiller

Administrative Assistant

Office of Public Lands - Executive Division

Department of Natural Resources

Phone : 517-284-5807

Fax : 517-335-4242

P.O. Box 30028

Lansing, MI 48909

[Chat with me on Teams!](#)



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



PHILLIP D. ROOS  
DIRECTOR

March 6, 2024

VIA EMAIL

William Ballard  
Mead & Hunt  
2605 Port Lansing Road  
Lansing, Michigan 48906

Dear William Ballard:

SUBJECT: Site Name: 39 - AZO Roadway 17/35 Extension EA  
Submission Number: HPZ-WQNA-5XPBW

Michigan Department of Environment, Great Lakes, and Energy (EGLE) has completed your July 18, 2023, request for comment regarding the Draft Environmental Assessment (EA) for the proposed runway addition for the Kalamazoo/Battle Creek International Airport. The EA has evaluated potential impacts of the project and alternatives.

EGLE has the following comments:

1. The alternative with the least number of impacts should be chosen unless it can be demonstrated why the alternative is not feasible or prudent. If impacts cannot be avoided, then they should be minimized to the greatest extent possible. When applying for permits, an alternatives analysis should consider whether the proposed impacts, such as the tree clearing, can be reduced to the greatest extent possible. Cumulative impacts from this project and others in the area will also be considered.
2. Any unavoidable impacts to regulated wetlands will require a permit under Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Before applying for permits, all potential wetlands within project area should be delineated by a professional wetland consultant and then reviewed by EGLE staff for verification. Wetland mitigation will likely be required for any unavoidable impacts because of this project.
3. The EA indicates that there are no streams, lakes, or floodplains within the proposed project area. Therefore, no permits will be required under Part 301, Inland Lakes and Streams, or the Floodplain Regulatory Authority of Part 31, Water Resources, of the NREPA.

4. A review of our database indicates no occurrences of state and/or federal threatened and endangered species in the project location. However, your project location is within the range of the Northern-Long Bat and Indiana Bat, which are listed as Endangered Species. The Michigan Department of Natural Resources (MDNR) is responsible for the protection of state endangered and threatened species under NREPA. It is recommended to consult with MDNR regarding state-listed threatened or endangered species and any potential impacts.

If you have any questions regarding this letter, please contact me at 616-295-2787; [JohnsonB67@Michigan.gov](mailto:JohnsonB67@Michigan.gov) or EGLE, Grand Rapids District Office, 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503. Please include Submission Number HPZ-WQNA-5XPBW in your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Johnson", with a long horizontal flourish extending to the right.

Benjamin Johnson  
Transportation Review Unit  
Water Resources Division

cc: James Watling, EGLE



**REGION 5**

CHICAGO, IL 60604

March 6, 2024

**VIA ELECTRONIC MAIL ONLY**

Misty Peavler  
Federal Aviation Administration  
Detroit Airports District Office  
11677 S Wayne Road  
Romulus, Michigan 48174-1412

**Re: EPA Comments - Draft Environmental Assessment for Runway 17/35 Extension and Taxiway C Realignment at Kalamazoo/Battle Creek International Airport; Kalamazoo, Michigan**

Dear Ms. Peavler:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Aviation Administration's (FAA) Draft Environmental Assessment (Draft EA) dated January 2024, regarding the above-mentioned proposed project. The non-Federal partner for this project is Kalamazoo County, Michigan. This letter provides EPA's comments pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Kalamazoo/Battle Creek International Airport (Airport) is classified by FAA as a non-hub, commercial service airport that serves the areas of Kalamazoo and Battle Creek and surrounding communities in southwest Michigan. The Draft EA states that the Airport's primary runway (Runway 17/35) length of 6,502 feet does not provide enough runway length to meet the needs of existing and future users of the Airport. The need for the proposed project is to extend Runway 17/35 to meet the takeoff and landing length requirements of existing and future aircraft.

The Draft EA analyzed five alternatives:

- The No Build Alternative;
- Alternative 1 – construction of a 1,000-foot extension of Runway 17/35 with a reconfigured intersection of Taxiway C and Runway 17;
- Alternative 2 – construction of a 1,150-foot extension of Runway 17/35 with a reconfigured intersection of Taxiway C and Runway 17;
- Alternative 3 – construction of a 1,000-foot extension of Runway 35; and

- Alternative 4 – construction of a 1,000-foot extension of Runway 17 with a reconfigured intersection of Taxiway C and Runway 17.

The Draft EA identified the Preferred Alternative to be Alternative 2. Key components of Alternative 2 include:

- Extending Runway 17 end by 150 feet;
- Extending Runway 35 end by 1,000 feet;
- Realigning Taxiway C at the approach end of Runway 17 to correct geometric deficiencies associated with the intersection of Taxiway C and Runway 17;
- Extending parallel Taxiway B to match the length of extended Runway 17/35;
- Relocating an existing railroad spur (owned by Norfolk Southern Railroad) on the south end of the Airport, including land acquisition;
- Acquiring aviation easements and land in both the Runway 17 and Runway 35 approaches for obstruction clearing;
- Clearing obstruction(s) in the Runway 17/35 approaches;
- Relocating existing airfield NAVAIDs; and
- Developing new aircraft approach and departure procedures for the extended Runway 17/35.

EPA's detailed comments on Draft EA are enclosed with this letter and focus on the project's purpose and need/project alternatives, noise impacts, project features, and historic, architectural, archaeological, and cultural resources. We recommend FAA address these comments and our recommendations before finalizing the forthcoming EA.

Thank you for the opportunity to provide input at this stage of project development. Please send an electronic copy of future NEPA documents to [R5NEPA@epa.gov](mailto:R5NEPA@epa.gov). If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead reviewer for this project, at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov). Ms. Kowal is also available at 312-353-5206.

Sincerely,

Krystle Z. McClain, P.E.  
NEPA Program Supervisor  
Environmental Justice, Community Health, and Environmental  
Review Division

Enclosures:  
EPA's Detailed Comments  
Construction Emission Control Checklist

## EPA's Detailed Comments

### Draft Environmental Assessment for Runway 17/35 Extension and Taxiway C Realignment at Kalamazoo/Battle Creek International Airport Kalamazoo, Michigan

March 6, 2024

#### **Purpose and Need / Project Alternatives**

The Draft EA indicates the existing 6,502-foot long Runway 17/35 is inadequate for many commercial service and business jet aircraft to operate at their maximum gross takeoff weight. When evaluating the runway length needs of current air aircraft operating at the Airport, critical aircraft have the most demanding runway length needs of 7,500 feet. However, the Draft EA indicates that, when evaluating the runway length needs of general aviation jet aircraft that currently operate at the Airport, a runway length of 8,125 feet for takeoff is more appropriate based on the 90 percent useful load performance curve.<sup>1</sup> In addition, operation by this critical aircraft category that require between 7,000 and 8,000 feet of runway length are expected to increase.

#### **Recommendations for FAA before finalizing the NEPA document:**

- Explain why the proposed extension of 1,150 feet, which will result in a total runway length of 7,650 feet, will be adequate versus the identified needs of 8,000 feet or 8,125 feet for general aviation jet aircraft.
- Explain how the extension lengths of 150 feet (Runway 17 end) and 1,000 feet (Runway 35 end) were chosen. Consider that extending Runway 17/35 solely to the south along Runway 35 would eliminate impacts to the north. The Draft EA mentions that a runway extension to the north would introduce both Interstate 94 and Romence Road into the Runway Protection Zone (RPZ). These are both incompatible land uses. Additionally, tree obstructions would need to be removed from the Bloomfield Subdivision Historic District (Historic District) if the runway is extended to the north.

#### **Noise**

The cumulative impacts analysis indicates the Airport is considering removing the existing noise curfew<sup>2</sup>. The Draft EA does not indicate when a decision regarding the curfew will be made and what FAA's role will be in revising, and potentially removing, the existing noise curfew.

#### **Recommendations for FAA before finalizing the NEPA document:**

- Discuss whether revising the existing noise curfew is part of the proposed project.
- Explain FAA's role in revising the existing noise curfew.
- Describe how air traffic at the Airport will change with the revised noise curfew (e.g., number of flights during nighttime hours, etc.)

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<sup>1</sup> Taken from FAA Advisory Circular 150/5325-4B.

<sup>2</sup> In the 1970s, a noise curfew/noise abatement program was established at the Airport to restrict night-time activity. The existing noise curfew restricts aviation activity from 11:00 PM to 6:30 AM on Runway 17/35 for aircraft over 75,000 pounds maximum weight and for any aircraft not certified or meeting current FAR Part 36 Standards.

- Discuss how a revised noise curfew would comply with existing state and local noise policies, if applicable.
- Analyze noise impacts to the Historic District and businesses as a result of a revised noise curfew.

### **Construction**

EPA acknowledges that the Draft EA references EPA's *Construction Emission Control Checklist* (Checklist).

#### **Recommendations for FAA before finalizing the NEPA document:**

- Require the Airport and project contractors to implement measures from the Checklist, to the extent practicable, in addition to the requirements from FAA's advisory circulars and construction guidelines.

### **Project Features**

The existing Norfolk Southern rail line would fall within the shifted RPZ under the proposed alternative, resulting in a required rail relocation.

#### **Recommendations for FAA before finalizing the NEPA document:**

- Discuss the rail line length that will need to be relocated under the proposed alternative.
- Discuss how train traffic will be impacted during and after construction of the new rail spur under the proposed alternative.

### **Historic, Architectural, Archaeological, and Cultural Resources**

The proposed project includes the removal or partial removal (tree trimming) of select mature trees within the Historic District. Figure 3.7 - *Historic District Area of Potential Effect* indicates which parcels currently have trees deemed to be obstructions to the departure surface under the proposed alternative. In a Memorandum of Agreement between FAA, the State Historic Protection Office and the Airport indicates that a tree-for-tree replacement program is proposed. Existing trees will be removed and replaced and replanted with species that grow to shorter heights.

#### **Recommendations for FAA before finalizing the NEPA document:**

- Quantify the acreage of mature tree obstructions proposed for removal under the Preferred Alternative.
- When reviewing Figure 3.7, EPA notes that not all trees have been marked for removal. Discuss why some trees under the departure surface would not be removed at this time (e.g., will some trees be trimmed in the future, etc.).
- Commit to planting only native tree species as replacements.
- Provide additional information on how nearby homeowners will be advised regarding proper maintenance of tree replacements.
- Commit to monitoring the replacement trees for a period of one to three years and replace any trees that die during this period.

## **U.S. Environmental Protection Agency** **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.<sup>1</sup> We recommend FAA consider the following protective measures when drafting contractor bids.

### **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 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.).<sup>2</sup>
- 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.).<sup>3</sup>
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).<sup>4</sup>
- 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 United States; 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).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.

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<sup>1</sup> Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

<sup>2</sup> <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

<sup>3</sup> <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

<sup>4</sup> <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Replace the engines of 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.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

### **Fugitive Dust Source Controls**

- 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 maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- 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.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

### **NEPA Documentation**

- Per Executive Order 13045 on Children's Health<sup>5</sup>, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

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<sup>5</sup> Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

March 8, 2024

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

Dear Mr. Ballard:

Re: City of Portage (City) Comments on Draft Environmental Assessment for Proposed Improvements Kalamazoo/Battle Creek International Airport, Kalamazoo, Michigan

Thank you for asking our comments on the Draft Environmental Assessment (EA) for the proposed 1,150-foot extension of Runway 17/35 and realignment of Taxiway C at the Kalamazoo/Battle Creek International Airport in Kalamazoo, Michigan. Please see the following for our comments:

1. In general, regardless of the selected alternative, the City requests to be consulted before any Runway Protection Zone (RPZ) modifications, or other restrictive elements are put in place affecting the City's public right of way. The City has the right to review and approve any restrictions or modifications proposed for the public right of way.
2. Any modification of Romence Road required for the proposed RPZ is expected to be funded as part of the Airport project and is subject to review and approval by the City of Portage.
3. The City has the right to review and approve the proposed relocation and potential undergrounding of existing overhead power lines in the public right of way on the north side of Romence Road.
4. A pedestrian trail is planned on the north side of Romence Road to interconnect with the City's existing trail network. Any avigation easement for an RPZ encroaching on the public right of way should not prohibit the construction of this trail.
5. Any modification to the railroad grade crossing at Romence Road is subject to review and approval by the City. Coordination with the County Road Commission will be required should the location affect the traffic signal at the Sprinkle Road intersection. A pre-track signal may be required based on the final location of the relocated crossing.
6. There is an existing 16" water main owned by the City of Portage along the east side of the existing railroad track. Should any modification of the track alignment be required, the project will need to properly address this (i.e. casing the water main) as part of the airport project. Any property modifications affecting the water main will need to ensure the City's access and rights to the main are preserved through an easement, either new or existing as required.

If you have any questions or would like to discuss the above comments, please feel free to contact the Department of Community Development at (269) 329-4477.

Sincerely,  
CITY OF PORTAGE



Peter J. Dame  
Chief Development Officer