

Environmental Planning: Collaborative Approaches, NEPA Preparation, and Schedule Considerations for Airport Projects

Presented by:

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**Federal Aviation
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Topics

- NEPA vs. Planning
- Important dates for environmental findings
- Schedule considerations for your project
 - i.e. Cultural Resources, Wetlands, Endangered Species, wildlife hazards
- Collaborative Approaches
 - NEPA and the Clean Water Act



Thoughts on NEPA vs. Planning

- National Environmental Policy Act (NEPA)
- Planning inputs into NEPA document
 - Surveys may be better suited in planning
 - Cultural resources, wetlands, endangered species, etc.
 - Depends on the project
 - Surveys provide input into Alternatives
 - Alternatives
 - Least Environmentally Damaging Practicable Alternative (LEDPA)
 - The more information up front the better
- Dual Track Planning and NEPA
 - Not Recommended
 - Creates airport sponsor confusion



Thoughts on NEPA vs. Planning

- Purpose and Need
 - Planning better identifies justification
 - Planning will determine if project ripe for implementation
- Tell the story in Planning
 - Clear picture of the project/problems
 - Land acquisition, restrictions,
 - Connected actions
 - Public Input
- Adequate planning provides for a better NEPA document!



Important Dates to Consider for Environmental Findings

- Discretionary Projects
 - Need environmental finding by October 1 to be competitive for 2017 design/construction grant
 - Includes Categorical Exclusions (CATEXes) and Environmental Assessments (EAs)
- Primary & Non-Primary Entitlements
 - Submit all environmental documents early with goal of having environmental finding by December 15 (Pre-application due date)
- EAs take Time!!!! (Potentially >1 year)
 - Public Involvement/Agency Coordination
- CATEXes are not a rubber stamp approval
 - Resources have to be assessed



Schedule Considerations for Environmental Findings

- Cultural Resources
- Wetlands
- Endangered Species
- Wildlife
- Other Special Purpose Laws
 - Air Quality
 - Water Quality
 - Section 4f
 - Others



Potential critical path environmental items in a schedule!



Cultural Resources



- SHPO coordination: 1.5 months
- Cultural Resources Survey
 - Study is commensurate with past disturbance and age of buildings
 - Types of Surveys
 - Background/Desktop research with request for historical information to SHPO
 - Phase I: Subsurface survey and background research
 - Phase II: Eligibility determination for property with potential listing
 - Phase III: Mitigation plan needed



Cultural Resources

- Tribal Coordination: Takes Time
 - Schedule Considerations
- Multiple Sioux/Non-Sioux Tribes



Endangered Species



- Northern Long Eared Bat (NLEB)
 - Listed Statewide as Threatened under ESA in SD
 - Roost in dead/dying trees
 - White Nose Syndrome in SE SD
 - Survey may be warranted
 - Consultation with USFWS
 - Framework for Consultation (NLEB presence within 1/4 mile from hibernacula (cave) or 150 feet of a known roost (tree))
 - Will need to identify proximity of habitat to airport
 - May affect determination (30 days for USFWS to respond)
 - Formal Consultation: ~Minimum 6 months
 - Tree Removal Window: October 1-March 31



Endangered Species Cont.

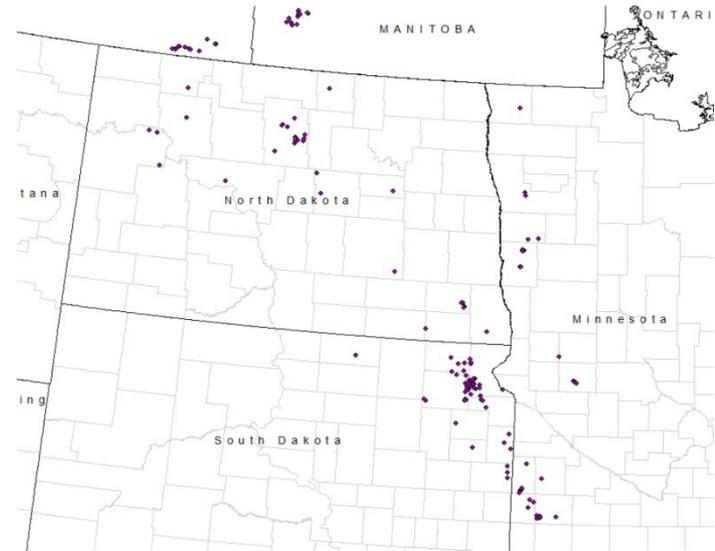


- Whooping Crane (Endangered)
 - Prefer shallow emergent wetlands along Missouri River
 - Listed in certain counties as endangered under ESA in SD
 - Mitigation for wetland removal within 10 miles of airport



Endangered Species Cont.

- Dakota Skipper (Threatened)
- Poweshiek Skipperling (Endangered)
 - Both species occupy native prairie regimes
 - Will need to identify proximity of habitat to airport



Wetlands

Impacts greater than ½ acre (Individual Permit)



Environmental Assessment

- Prefer to see a conceptual mitigation plan
- FAA requires mitigation for all wetland impacts
- Plan ahead for wetland permits
 - Permitting takes time and largely depends on functions and values of the wetland being impacted
 - Ideally, FAA would like permits in place to be competitive for discretionary funding (October 1)
 - Mitigation always required regardless of jurisdiction



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Wildlife



- Wildlife Advisory Circular (AC)150-5200-33B
 - 5,000 foot separation distance for piston powered aircraft
 - 10,000 foot separation distance for turbine powered aircraft
- Airport zoning should discourage the siting of wildlife attractants near an air operations area (AOA)
 - i.e. wetland mitigation
- Every wetland on airport property is NOT considered a wildlife hazard!
 - Justification can be a Wildlife Hazard Site Visit (WHSV) or Wildlife Hazard Site Assessment (WHSA)
 - Completed by qualified Airport Biologist
 - Wildlife Hazard Management Plan (WHMP) is a good way to mitigate and manage for wildlife attractants



Wildlife: WHMP example

RRT WILDLIFE MANAGEMENT PROJECTS	TARGET DATE	DATE COMPLETED
Complete and maintain wildlife deterrent fencing around the airfield as part of the Runway capital improvement project	2016	
Removal of trees and Scrubs on Airport property in AOA	Fall 2015	
Clear and maintain drainage ditches to the extent possible throughout the airfield to enhance water flow		Ongoing
Stock and maintain wildlife control supplies		Ongoing
Evaluate potential wildlife hazards associated with new construction		Ongoing
Train employees in the safe and effective application of wildlife dispersal measures	Annually	
Evaluate and maintain a Wildlife Hazard Management Plan	Annually	
Maintain all Federal and State depredations permits	As necessary	
Continue working with adjacent land owners to address borrow pits		Pits immediately NW of field filled fall 2014
Monitor White tail jack rabbit population to determine need for removal program		Ongoing
Work with City of Warroad to close and relocate disposal pit for fish remains		Closed several years ago
Work with USFWS to add Sandhill Cranes to depredation permit		Ongoing



Collaboration through Environmental Review

- **NEPA/Section 404 Clean Water Act (CWA) Merger**
 - Concurrence Point Process
 - Establishes “one decision-making process” to addressing agency jurisdictional interests at four key points
 - Concurrence points occur at project milestone activities.
- **Background Information**
 - Timeframes



Concurrence Points

- **Advantages**

- Environmental protection
- Identify critical issues early
- Predictable schedules and budgets
- Better use of agency time
- Early scoping of resource for regulatory agencies
- Provides for joint-agency evaluation
- **Maximizes the probability of the project receiving the appropriate permits and approvals from the resource agencies**



Collaboration with Partner Agencies

- **Partners**

- Federal Agencies
 - NEPA/CWA: USACE and FAA joint review
- State Agencies
- Local Entities
- Sometimes non-governmental entities



Concurrence Points

- **Process**

- Formal (MOU) or Informal (Letter) agreement
 - Between FAA and USACE
 - Agreement among non-signatory agencies for time, meeting attendance and decision making/concurrence point agreement/disagreement



Concurrence Points

- **Process cont.**
 - Concurrence Point # 1
 - Purpose and Need
 - Concurrence Point #2
 - Alternatives
 - Concurrence Point # 3
 - Selected Alternative/Least Environmentally Damaing Practicable Alternative (LEDPA)
 - Concurrence Point #4
 - Mitigation



Concurrence Points

- **Process cont.**
 - Final NEPA Document
 - Decision Document
 - Concurrence Point #4
 - 404 Permit



In Summary...

- Primary & Non-Primary Entitlements
 - Submit all environmental documents early with goal of having environmental finding by December 15 (Pre-application due date)
- Discretionary funding needs environmental finding by October 1
- Work with FAA Environmental Specialist early to ensure projects are properly vetted



In Summary...

- Planning provides NEPA inputs
- Submit easy projects early
 - Example: simple pavement rehabilitation
- Project studies **WILL** impact your schedule
 - Plan ahead for cultural resources, wetlands, endangered species, wildlife
- Collaborate!
 - May add time, but beneficial in the long haul



Questions?

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