

**Department of Transportation
Federal Aviation Administration (FAA)
Minneapolis Airports District Office
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
For the Land Use Compatibility and Obstruction Removal
Environmental Assessment (EA)
At the South St. Paul Municipal Airport
City of South St. Paul, Dakota County, Minnesota**

The FAA prepared this FONSI for the proposed Land Use Compatibility and Obstruction Removal EA at the South St. Paul Municipal Airport (Airport). In accordance with FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, and based on the evaluation in the EA, dated February 2015, there are no significant impacts associated with the proposed project. Therefore, an Environmental Impact Statement (EIS) will not be prepared and an FONSI is being issued.

I. Purpose and Need

The purpose is that Airport is currently not in full compliance with federal land use compatibility and airspace restriction standards. Specifically, incompatible land uses exist within the existing Runway 16 Runway Protection Zone (RPZ) including:

1. Four residential parcels (three single-family, one duplex) on South Street are located within the northern portion of the Runway 16 RPZ.
2. Approximately 32 parking spaces serving McMorrow Field, a City park located immediately north of the Airport, are currently within the central portion of the Runway 16 RPZ. Because these parking spaces will be removed from the Runway 16 RPZ through a broader City park planning and redevelopment initiative, further attention to this existing deficiency is not required in this EA/FONSI.
3. Existence of a community garden within the Runway 16 RPZ.
4. On-street parking along South Street exists within the northern portion of the Runway 16 RPZ.
5. One non-residential storage structure is located within the southeast portion of the Runway 34 RPZ.

Airspace analyses revealed the following obstructions as requiring action:

1. Approximately 265 trees per Part 77 and Approach-Departure "Row 5" surfaces.
2. 22 man-made structures per Part 77 surfaces, including a combination of airport hangars, off-airport buildings, poles, and fence locations.

II. Alternatives Considered

In accordance with FAA Order 1050.1E, the EA identified and evaluated the No Action alternative, Proposed Action, and other reasonable alternatives.

No Action Alternative

The No Action alternative does not address the safety concern of obstructions and land

incompatibilities, nor meet the purpose and need, therefore was dismissed from further consideration. The Airport would continue to operate and maintain the airport under its current condition using the no action alternative.

Fee Simple Land Acquisition Versus Easement:

An alternative of examining fee purchase of all four residential parcels would result in displacement of two additional families beyond the three to be displaced by the Proposed Action. Purchase of partial easements over the westernmost two residential parcels is preferred over purchase in fee as it minimizes adverse effects to the residents and minimizes cost to the Airport, therefore this alternative was dismissed.

Runway Shift to avoid Land Use Incompatibilities:

An alternative to shift the Runway 16 threshold to the south to remove the homes north of South Street from the Runway 16 RPZ was analyzed. With any shift of the Runway 16 threshold, the RPZ would have to be cleared of all incompatible land uses, including South Street and the adjacent trail on the south side. This would necessitate shifting the threshold 153 feet to the south. The greatest amount that this loss could realistically be mitigated at the Runway 34 end without requiring a realignment of nearby 70th Street would be to add 111 feet in length. Thus, the option of moving the Runway 16 threshold to the south to clear all residential properties would result in a loss of 42 feet of runway length. The current length of Runway 16/34 is 4,002 feet. According to Advisory Circular 150/5325-4B (*Runway Length Recommendations for Airport Design*), the recommended length for an airport such as South St. Paul is 4,300 feet. The runway would be undersized. Any reduction in length is not a viable option for airport utilization and safety reasons and was therefore dismissed.

Tree Trimming:

Comprehensive trimming of trees to lower tree heights below the runway approach and remove penetration of the approach surface was analyzed to avoid tree removal. However, additional factors were considered. The FAA would reimburse the cost of obstruction removal only once for a given tree and would not cover ongoing costs for future trimming. Thus, comprehensively mitigating all tree obstructions through trimming versus removal would result in excessive on-going costs, and this alternative was therefore dismissed.

III. Proposed Action

The Proposed Action includes securing control over portions of the Runway 16 RPZ currently in residential use. Two full residential parcels (0.56 acre) on the north side of South Street West will be acquired in fee. One of these is single-family and the other is a duplex property. All existing structures on these parcels will be removed, along with any other natural or man-made obstructions. The area of the purchased parcels will be restored by grading and seeded to stabilize disturbed soils. Easements over approximately 0.04 acre (combined) in the front yard portion of the two parcels directly west of the full acquisition parcels will be acquired to allow the City sufficient control to remove obstructions now or in the future.

Parking will be removed by the City along a portion of South Street West that is within the RPZ. In addition, a backyard shed within the southeast portion of the Runway 34 RPZ will be removed.

Approximately 265 trees will be mitigated to meet FAR Part 77 and Approach-Departure Row 5 requirements. The identified trees will be removed rather than trimmed to save on long-term costs. The value of the trees will be appraised in accordance with the federal Uniform Real Property Acquisition Policies Act (49 CFR Part 24) to quantify the financial effect of the tree loss on the property. The City will pay for the financial effects of tree removal on the properties and for the tree removal itself, and will provide a list of low-growing tree species that will not need future trimming if planted as replacement trees. Approximately 40 trees will be removed per year starting in 2015 and concluding in approximately 2021 pending funding availability over this timeframe

Approximately 25 man-made FAR Part 77 obstructions were identified. Of these obstructions, a bird feeder has already been removed and two other fences will be removed. Of the remaining 22, 11 are off-airport and 11 are on-airport. The 11 off-airport obstructions received a Determination of No Hazard, and no further action is required to mitigate them. Nine of the 11 on-airport obstructions will be mitigated by receiving obstruction lighting and the remaining two do not require mitigation.

Approximately 90 percent of a South St. Paul community garden was within the RPZ and approximately 70 percent was within the central portion of the RPZ. At the end of the 2013 gardening season, the old site was closed, and in June, 2014 a replacement site approximately 1.25 miles to the northeast was opened.

After careful analysis and consultation with various state and federal resource agencies, the Airport selected the proposed action as the preferred alternative. This alternative satisfies the purpose and need for the project while causing minimum adverse environmental impacts.

IV. Environmental Consequences and Mitigation

The Final EA discusses the environmental consequences of the Proposed Action. The Proposed Action will eliminate 265 trees and have short-term construction impacts.

The Airport will implement the following mitigation measures as a condition of environmental approval of the proposed development listed in this FONSI to support existing and proposed aeronautical activities at the Airport:

- Section 4(f) of the Department of Transportation Act requires an analysis of park related impacts due to transportation project. The removal of the community garden from the RPZ received Section 4(f) de minimis concurrence from the Department of Interior.
- The Airport will obtain any necessary permits and complete any required mitigation prior to beginning construction.
- The Airport will include Best Management Practices (BMPs) to minimize construction impacts. Project design and construction plans will identify specific

control methods to minimize impacts. The Airport will consider residential areas when identifying haul routes and construction activity hours. Construction will comply with the most current version of the FAA specifications AC 150/5370-2 (*Operational Safety on Airports during Construction*) and AC 150/5370-10 (*Standards for Specifying Construction of Airports*).

- During construction, in the event that previously unknown contaminants are discovered or if a reportable spill occurs, work will cease. The Airport notifies appropriate local, state, and FAA, including the MPCA. Remediation of the contaminated area will occur before project construction recommences.
- If a cultural resource is discovered during construction, all work will cease until the Airport notifies the State Historic Preservation Office and the FAA Dakota-Minnesota ADO. The Airport will protect the area from adverse weather conditions and trespassing and/or vandalism until cultural resource concerns have been appropriately addressed. The Airport will take action to comply with the National Historic Preservation Act, the Native American Graves Protection and Repatriation Act, and the Archaeological Resources Protection Act, as appropriate.
- The Northern Long-Eared Bat (NLEB) is proposed as endangered under the Endangered Species Act. If the NLEB is sighted during construction, work will cease in the immediate area of the species and all sightings will be reported to the US Fish and Wildlife Service (USFWS), and the FAA Dakota-Minnesota ADO. Subject to the one-time contingency condition outlined in the following bullet item, tree removal will only take place between October 1st and March 31st to avoid the summer roosting period for this species.
- For 2015, tree removal may need to occur outside the October 1st through March 31st tree removal window for the NLEB. The need for expanded time frame is a result of an FAA inspection at South St. Paul airport that identified 17 trees as obstructions to instrument approaches. The instrument approaches are not useable at night due to the obstructions, thereby reducing aviation safety. If required, based on coordination with the USFWS, the following steps will be followed to obtain approval for tree removal during the summer:
 1. This protocol is viewed as a contingency plan and will only apply to the 2015 summer season. Afterwards the Airport will follow the requirements outlined in the Environmental Assessment/FONSI.
 2. There is a 30-day window after the NLEB has been designated as endangered, which extends the acceptable tree removal season until April 30th, 2015.
 3. The Airport requested the FAA to reassess the number of trees to be removed. This request is based on a recent decision to reduce the width of the approach surfaces from 800-feet to 400-feet. The 400-foot surface and the reduced number of trees were approved by FAA on January 9, 2015.
 4. The Airport will focus on removing the trees that are in the 400-foot width approach surfaces first. The tree total for this area is five.

FINAL CONDENSED ENVIRONMENTAL ASSESSMENT
Federal Aviation Administration – Great Lakes Region
Airport: South St. Paul Municipal Airport - Richard E. Fleming Field
Project: Land Use Compatibility and Obstruction Removal

Federal Aviation Administration Great Lakes Region

Condensed Environmental Assessment

The Condensed Environmental Assessment (Condensed EA) is appropriate for Great Lakes Region airport projects when a project:

- Cannot be Categorically Excluded (CATEX),
- Does not have significant impacts, and
- A detailed Environmental Assessment (EA) is not needed.

Proper completion of this document will allow the Federal Aviation Administration (FAA), and/or State Block Grant States, to determine whether the Condensed EA is appropriate for the proposed project and to support a Finding of No Significant Impact (FONSI).

Resource guidance used in preparation of this form comes from the FAA's Order 1050.1E, "Environmental Impacts: Policies and Procedures" or subsequent revisions. This order incorporates the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA), as well as the US Department of Transportation's environmental regulations (including FAA Order 5050.4B or subsequent revisions), and other federal statutes and regulations. Accordingly, this form is intended to meet the Federal regulatory requirements of an EA.

This format is appropriate if the proposed project's involvement with, or impacts to, extraordinary circumstances are not notable in number or degree and do not rise to the level of a full EA.

Consult with an Environmental Specialist at the FAA to determine if this form is appropriate for your project.

To complete this form, the preparer should describe the proposed project and provide information on any potential impacts of the proposed project. It will be necessary for the preparer to have knowledge of the environmental features of the airport. Although some of this information may be obtained from the preparer's own observations, environmental studies or other research may be necessary. Complete consultation with applicable Federal, state, and local resource agencies responsible for protecting specially protected resources prior to submitting this form to the FAA.

This form is not meant to be a stand-alone document. Rather, it is intended to be used in conjunction with the applicable orders, laws, and guidance documents, and in consultation with the appropriate resource agencies.

An appendix that contains all the figures, correspondence, and completed studies (or executive summaries of completed studies) should accompany the completed Condensed EA when submitted to the FAA for final approval.