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## Appendix A – Early Agency Coordination

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Agency Contact List

Federal and State Coordination - Master List						
Mr. Rodman	Mark Rodman	State Historic Preservation Officer	State Historic Preservation Office	300 North Washington Square	Lansing, Michigan 48913	<a href="mailto:rodmanm@michigan.gov">rodmanm@michigan.gov</a>
Mr. Houtteman	Steve Houtteman	Aeronautics Environmental Specialist	Office of Aeronautics, MDOT	2700 Port Lansing Road	Lansing, MI 48906	616-299-2654
Mr. Comrov	Aaron Comrov	Environmental Protection Specialist	FAA, Infrastructure Engineering Center-Chicago, AJW-2C15H	2300 East Devon Avenue, Room 450	Des Plaines, Illinois 60018	847.294.7665
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	P.O. Box 30458	Lansing, MI 48909-7958	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. Dugan	Moises Dugan	Regional Administrator (Acting)	Federal Emergency Management Agency, Region 5	536 South Clark Street, 6th Floor	Chicago, Illinois 60605	312-408-5500
Ms. Gagliardo	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	Kenneth Westlake	Chief	EPA Region 5 , NEPA Implementation Section	77 West Jackson Boulevard	Chicago, Illinois 60604	312-886-2910
Ms. Lott	Shannon Lott	Natural Resources Deputy	Michigan Department of Natural Resources, Executive Division	P.O. Box 30028	Lansing, MI 48909	517-243-3166/517-284-5810
Local & Political Coordination - Master List						
Ms. Hepting	Karry Hepting	Administrator/Controller	St. Claire County Administrator/Controller Department	200 Grand River Ave. Suite 203	Port Huron, MI 48060	(810) 989-6900
Ms. Torello	Joi Torello	Commissioner	St. Claire County Board of Comissioners	3210 Strawberry Ln	Port Huron, MI 48060	810-217-3588
Mr. Struck	David Struck	Planning Director	St. Clair County Metro Planning Commission	200 Grand River Ave. Suite 202	Port Huron, MI 48060	(810) 989-6950
Mr. Usakowski	Rob Usakowski	Kimball Township Supervisor	Kimball Township Administration	2160 Wadhams Rd	Kmiball, MI 48074	(810)987-9797
Ms, Phelan	Georgia Phelan	Economic Development Commissioner	St Clair County Metro Planning Commission	200 Grand River Ave, Suite 202	Port Huron, MI 48060	(810)989-6950
Mr. Orr	Bill Orr	Planning Commission Chairperson	Kimball Township Planning Comission	2160 Wadhams Rd	Kmiball, MI 48074	(810)987-9797
Native American Coordination - Master List						
President	Joeseph Wildcat, Sr.	President	Lac du Flambeau of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	PO Box 67	Lac du Flambeau, WI 54538	(715)588-7930
Chairperson	Regina Gasco-Bentley	Chairperson	Little Traverse Bay Bands of Odawa Indians, Michigan	7500 Odawa Circle	Harbor Springs, MI 49740	(231)242-1418
Chairman	Ron Corn Sr.	Chairman	Menominee Indian Tribe of Wisconsin	PO Box 910	Keshena, WI 54135	(715)799-3373
Chief	Douglas Lankford	Chief	Miami Tribe of Oklahoma	PO Box 1326	Miami, OK	(918)542-1445
Chief	Theresa Jackson	Chief	Saginaw Chippewa Indian Tribe of Michigan	7500 Soaring Eagle Blvd.	Mt. Pleasant, MI 48858	(989)775-4131
Chairperson	Aaron Payment	Chairperson	Sault Ste. Marie Tribe of Chippewa Indians, Michigan	523 Ashmun St.	Sault Ste. Marie, MI 49783	(906)635-6050

# Sample Agency Letter



2605 Port Lansing Road  
Lansing, Michigan 48906  
517-321-8334  
meadhunt.com

March 23, 2023

«Contact\_Name»

«Title»

«Organization»

«Address»

«City\_State\_Zip»

Re: Early Coordination Review of Proposed Improvements  
St. Clair County International Airport, Smiths Creek, Michigan

Dear «Salutation\_line»:

The St. Clair International Airport (Airport or PHN) proposes to clear, grub, and grade 63 acres of land located off the ends of Runway 4/22. The proposed action is needed to remove existing and potential obstructions identified as penetrations to the Federal Aviation Regulations (FAR) Part 77 Imaginary Surfaces (FAR Part 77), Threshold Siting Surface (TSS), Light Signal Clearance Surface (LSCS), Obstacle Clearance Surface (OCS), as well as the Michigan State Licensing Surface. Unmaintained vegetation has the potential to become obstructions to runway approaches in the future. The land where removal will take place is on Airport property, private property with existing easements, and approximately 23 private properties requiring new easements.

It should be noted that the project area contains protected environmental resources. A preliminary review indicates that the following major environmental resources may experience impacts from the proposed project and may require additional analysis, regulatory agency coordination and/or technical studies, and mitigation development. These resources include:

- Air Quality – The project is in non-attainment for ozone and sulfur dioxide
- Farmland – The project area contains Prime Farmland if Drained and Farmland of Local Importance soils
- Wetlands – Preliminary investigations indicate that regulated wetlands may be impacted
- Threatened and Endangered Species – Habitat for several protected species is found in the project area and may be impacted

Federal funding will be utilized for the proposed Runway 4/22 easement acquisition and obstruction removals; therefore, environmental documentation and analysis sufficient to satisfy the National Environmental Policy Act (NEPA) is required by law. To meet this requirement an Environmental Assessment (EA) will be completed 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 NEPA.

The Michigan Department of Transportation Office of Aeronautics (MDOT AERO) acting on behalf of the FAA is the lead 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*.

It should be noted that MDOT AERO does not necessarily endorse the proposed project, nor have they agreed to a Preferred Alternative. MDOT AERO is requiring the Airport to fully evaluate the Purpose and Need, any reasonable alternatives including the No Action Alternative, and identify associated impacts leading to the selection of the Preferred Alternative.

Major future development items that will be covered in this EA includes:

- Clearing 63 acres of vegetation and obstructive objects at the ends of runway 4/22
- Grub 63 acres of land at the end of runway 4/22
- Grade 63 acres of land at the end of runway 4/22
- Obtain new easements for 23 private properties

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 Airport's location and approximate project area limits. To sufficiently address key project issues and maintain the project schedule, your comments are requested by (date).

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](mailto:william.ballard@meadhunt.com)

Sincerely,

Steve Houtteman  
Supervisor, Airport Planning & Environmental Unit  
Michigan Department of Transportation Office of Aeronautics

Enclosures

cc:

Aaron Thelenwood, Airport Authority Director  
William Ballard, Mead & Hunt

# Sample Tribal Letter

April 3, 2025

Joeseeph Wildcat, Sr.

President

Lac du Flambeau of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin

PO Box 67

Lac du Flambeau, WI 54538

Re: Early Agency Coordination and Review of Proposed Improvements  
St. Clair County International Airport, Port Huron, Michigan

Dear President:

The St. Clair International Airport (Airport or PHN) proposes to clear and / or grub, and grade approximately 86 acres of land located off the ends of Runway 4/22. The proposed action is needed to remove existing and potential obstructions identified as penetrations to the Federal Aviation Regulations (FAR) Part 77 Imaginary Surfaces (FAR Part 77), Threshold Siting Surface (TSS), Precision Approach Path Indicator (PAPI) Light Signal Clearance Surface (LSCS), Obstacle Clearance Surface (OCS), as well as the Michigan State Licensing Surface. Unmaintained vegetation has the potential to become obstructions to runway approaches in the future. The land where removal will take place is on Airport property, private property with existing easements, and approximately 23 private properties requiring new easements.

Federal funding will be utilized for the proposed Runway 4/22 easement acquisition and obstruction removals; therefore, environmental documentation and analysis sufficient to satisfy the National Environmental Policy Act (NEPA) is required by law. To meet this requirement an Environmental Assessment (EA) will be completed. The EA will define and analyze potential impacts of the proposed action and 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 NEPA.

The Michigan Department of Transportation Office of Aeronautics (MDOT AERO) acting on behalf of the FAA is the lead 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.*

Major future development items that will be covered in this EA includes:

- Clearing, and/or grubbing and grading, where feasible, of approximately 86 acres of forested land located in the Runway 4/22 approaches for current and future obstruction removals.
- Acquisition of avigation easements over 21 private parcels to allow for current and future obstruction removals in the Runway 4/22 approaches.

As part of our early agency coordination, we are attempting to identify key issues that will need to be addressed during the NEPA process. MDOT AERO requests your comments regarding this project, any 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.

For your convenience, several maps and figures are enclosed that illustrate the Airport's location and approximate project area limits. To sufficiently address key project issues and maintain the project schedule, your comments are requested by May 2, 2025.

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](mailto:william.ballard@meadhunt.com)

Sincerely,

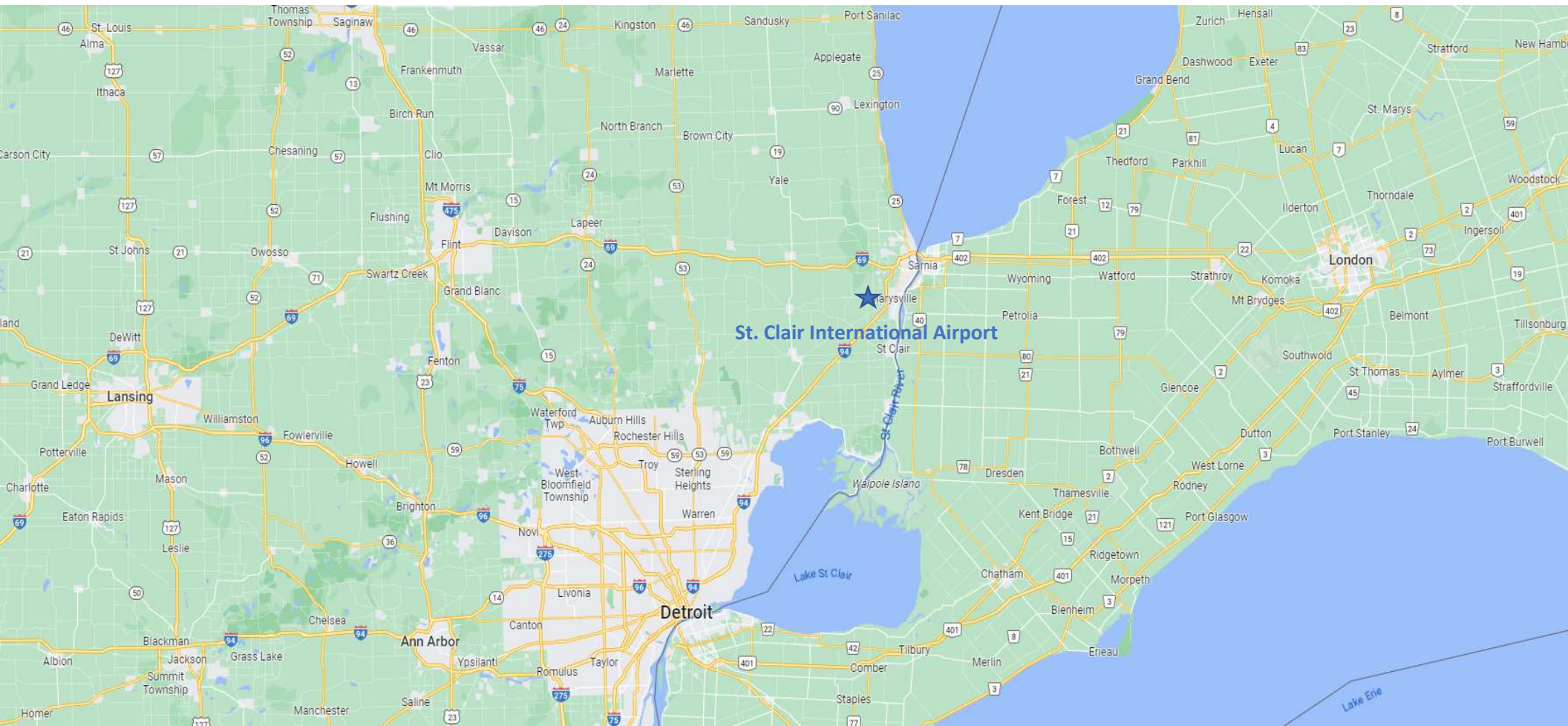
Stan Reinke  
Environmental Specialist  
Michigan Department of Transportation Office of Aeronautics

Enclosures

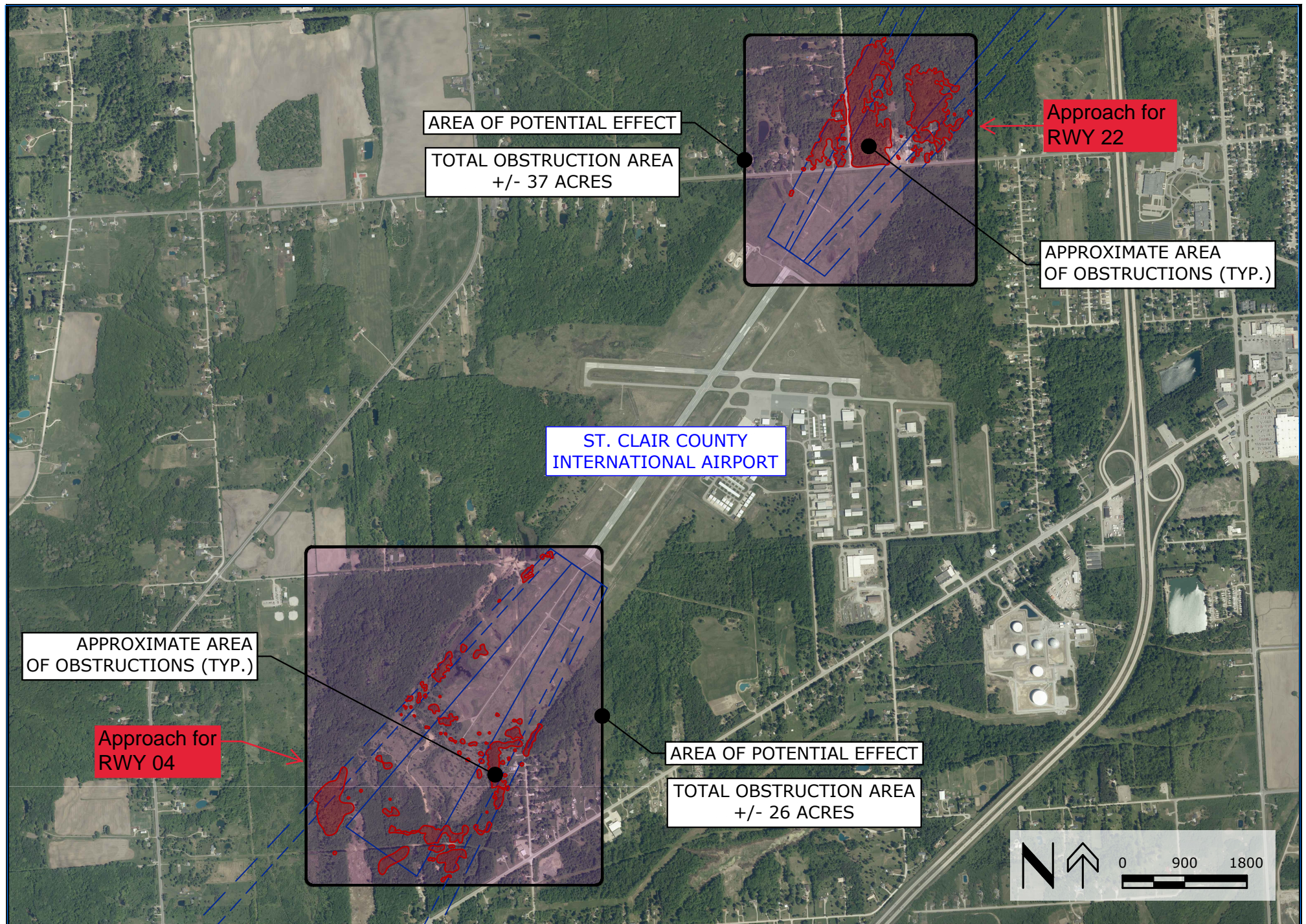
cc:

Catherine Fiore, Airport Director  
William Ballard, Mead & Hunt

# Project Area Maps Sent with Each Agency and Tribal Letter



**St. Clair International Airport (PHN)**  
**Smiths Creek, St. Clair County, Michigan**



**PHN - Runway 4/22 Area of Potential Effect**



# Agency Responses

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## STC International Airport Review


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From Barnes, Kaitlyn (DNR) <BarnesK10@michigan.gov>

Date Wed 4/9/2025 3:49 PM

To William Ballard <william.ballard@meadhunt.com>

Cc Hiller, Lindsay (DNR) <HillerL1@michigan.gov>; Robison, Joseph (DNR) <RobisonJ@michigan.gov>

 1 attachment (3 MB)

Mead and Hunt - St. Clair County International Airport, Port Huron.pdf;

You don't often get email from barnesk10@michigan.gov. [Learn why this is important](#)

Hello William,

I have reviewed the attached letter and I have no comments or concerns. To address your request directly:

- Specific areas of concern / regulatory jurisdiction: Macomb and St. Clair Counties
- Specific benefits of project to MI DNR or the public: none
- Technical information / data: Michigan Natural Features Inventory Biotics (no active observations)
- Potential mitigation / permitting requirements for project implementation: none

Thank you



Kaitlyn

**Kaitlyn Barnes, Wildlife Biologist**  
**Waterfowl Specialist – Acting**

Michigan Dept. of Natural Resources  
Port Huron State Game Area Field Office  
6181 Lapeer Road, Kimball, 48074  
Cell: (586) 719-1111 (call/text)

[Michigan.gov/wildlife](https://michigan.gov/wildlife)

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## EPA NEPA Comments - Proposed Improvements at St. Clair International Airport

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**From** Car, Julie <Car.Julie@epa.gov>

**Date** Mon 4/28/2025 10:59 AM

**To** misty.peavler@faa.gov <misty.peavler@faa.gov>

**Cc** William Ballard <william.ballard@meadhunt.com>

 1 attachment (409 KB)

EPA Scoping Comments\_St. Clair County Airport Improvements.pdf;

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

Hello,

Attached to this email are EPA's comments regarding the scoping request for proposed improvements at St. Clair International Airport, Port Huron, St. Clair County, Michigan.

Do not hesitate to contact me if you have questions or comments regarding our correspondence. We appreciate the opportunity to be involved in the NEPA process.

Thank you,  
Julie Car

Julie Car  
National Environmental Policy Act Reviewer  
EPA Region 5 | 77 West Jackson Blvd. | Chicago, Illinois 60604  
Phone: 312-353-1369  
Email: [car.julie@epa.gov](mailto:car.julie@epa.gov)





**REGION 5**  
CHICAGO, IL 60604

April 28, 2025

**VIA ELECTRONIC MAIL ONLY**

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

**Re: EPA Scoping Comments: Proposed Improvements at St. Clair International Airport, Port Huron, St. Clair County, Michigan**

Dear Ms. Peavler:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Aviation Administration's (FAA) request for comments (hereafter: scoping document) dated April 3, 2025, regarding the proposed removal of obstructions and easement acquisitions at the St. Clair International Airport in Port Huron, Michigan. FAA is the lead federal agency under the National Environmental Policy Act (NEPA). This letter provides EPA's comments pursuant to NEPA and EPA's NEPA review authority under Section 309 of the Clean Air Act.

The proposed project would include clearing and/or grubbing and grading of approximately 86 acres of forested land to remove current and future obstructions off the ends of Runway 4-22, and acquisition of aviation easements over 21 private parcels to allow for current and future obstruction removals.

EPA's enclosed comments focus on purpose and need /project alternatives, air resources and emission impacts, aquatic resources, historic and cultural resources, socioeconomic impacts and public involvement, project staging, natural features, non-native and invasive species, reasonably foreseeable environmental effects, and interagency coordination and permitting. EPA recommends that FAA address EPA's recommendations before releasing the forthcoming Draft EA.

Thank you for the opportunity to provide comments during the earliest stages of project development. If you have questions or would like to discuss the contents of this letter further, please contact the lead NEPA reviewer, Julie Car, at [car.julie@epa.gov](mailto:car.julie@epa.gov) or 312-353-1369. Electronic copies of future NEPA documents related to this project should be sent to [R5NEPA@epa.gov](mailto:R5NEPA@epa.gov).

Sincerely,

**KRYSTLE**  
**MCCLAIN**

Digitally signed by  
KRYSTLE MCCLAIN  
Date: 2025.04.28  
09:40:07 -05'00'

Krystle Z. McClain, P.E.  
NEPA Program Supervisor  
EPA Region 5

Enclosures

EPA's Detailed Scoping Comments

Construction Emission Control Recommendations

cc (with enclosures)

Bill Ballard, Mead & Hunt, [William.ballard@meadhunt.com](mailto:William.ballard@meadhunt.com)

EPA's Detailed Scoping Comments  
Proposed Improvements at St. Clair County International Airport  
Port Huron, St. Clair County, Michigan

April 28, 2025

**1. PURPOSE AND NEED/PROJECT ALTERNATIVES**

- A. The scoping document states the FAA is preparing an EA to identify potential Social, Economic, and Environmental impacts related to the proposed project. The proposed project would remove existing and potential obstructions on Airport property, private property with existing aviation easements, and 21 private properties requiring acquisition of new aviation easements.

**Recommendations for the Draft EA:**

1. Analyze the No Action alternative and all action alternatives which satisfy the purpose and need.
2. Visually depict each alternative, including the proposed project footprint and project elements (e.g., staging areas).
3. Identify any alternatives considered but dismissed from further consideration. Provide elimination criteria and clear explanations for their elimination.

**2. AIR RESOURCES AND EMISSIONS IMPACTS**

- A. 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. In 2001, EPA classified diesel emissions as a likely human carcinogen.<sup>1</sup> Diesel exhaust can worsen heart and lung disease, especially in vulnerable and sensitive populations.

**Recommendations for the Draft EA:**

1. Discuss the current air quality for the project area. Indicate whether the project area is in maintenance or non-attainment status for any National Ambient Air Quality Standards.
2. Discuss potential emissions expected from implementation of the proposed project. Consider equipment used for construction, daily worker commutes, and truck trips to haul materials.
3. Identify and discuss specific measures to reduce construction and maintenance emissions, and how such mitigation can be achieved in practice, such as through contracts, permit conditions, and Memorandum of Understanding. EPA recommends FAA consider:
  - a. requiring dust suppressant strategies, such as watering soils;
  - b. limiting and enforcing idle time for construction trucks and heavy equipment;
  - c. soliciting bids that require zero-emission technologies or advanced emission control systems;

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<sup>1</sup> For more information on EPA's classification for diesel emissions, see [https://iris.epa.gov/ChemicalLanding/&substance\\_nmbr=642](https://iris.epa.gov/ChemicalLanding/&substance_nmbr=642)

- d. developing a construction traffic management plan that ensures trucks hauling materials and heavy machinery avoid areas where children congregate within adjacent neighborhoods; and
- e. when possible, route construction traffic away from schools, daycare facilities, and parks, using crossing guards when such areas cannot be avoided. Additional best practices are identified in the enclosed Construction Emission Control Recommendations.

### **3. AQUATIC RESOURCES**

- A. Regulated wetlands may be located within the project footprint or staging areas. Depending on the methods undertaken, removal of trees or shrubs in wetland areas may trigger the need for permitting. Implementation of the project as proposed could result in impacts to regulated wetlands and streams. The placement of fill into wetlands may trigger the need for Clean Water Act (CWA) Section 404 permitting, CWA Section 401 Water Quality Certification, and other permits from the Michigan Department of Environment, Great Lakes, and Energy (EGLE).

#### **Recommendations for the Draft EA:**

- 1. A formal wetland delineation of the project area, including staging areas, should be completed to know definitively where wetlands, streams, and other regulated water resources are located. This delineation should be submitted to and coordinated with Michigan EGLE for review and a jurisdictional determination. EPA recommends that this delineation be included in the Draft EA as an appendix. The Draft EA should provide accurate information on impacts to regulated water resources, as well as how those impacts will be mitigated.
- 2. Regarding proposed tree trimming and removal, disclose the types and numbers (and acreage) of shrubby and/or forested areas that are proposed to be cleared or “topped” due to implementation of the proposed action, and disclose whether these clearing areas are in wetlands or streams. Discuss how tree and shrub clearing or removal (both in and out of wetlands) will be undertaken. Specifically, state if trees/shrubs will be mechanically cleared (bulldozed) or cut at their base (leaving the trunks intact). This differentiation in tree/shrub removal is important with regard to regulatory requirements under the CWA.
- 3. Discuss the expected acreage of wetlands and the linear footage of streams to be impacted by the proposed project (and the No Action alternative). Differentiate between temporary and permanent impacts.
- 4. Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts.
- 5. Describe proposed measures to capture and filter stormwater runoff.
- 6. Identify and discuss whether National Pollution Discharge Elimination System CWA Section 402 direct discharge and/or stormwater construction permits may be required for each alternative.

7. Discuss impairments<sup>2</sup> precluding meeting water quality standards and analyze how the proposed project, including alternatives, could affect the listing of waterbodies (both positively and negatively).
8. Discuss how the proposed project could affect water quality in the watershed, including how removal of vegetation could lead to reduced infiltration of rainwater and greater erosion.

#### **4. HISTORIC AND CULTURAL RESOURCES**

- A. The National Historic Preservation Act (NHPA) and NEPA are independent statutes, yet may be executed concurrently to optimize efficiencies, transparency, and accountability to better understand the effects to the human, natural, and cultural environment.

##### **Recommendations for the Draft EA:**

1. Document coordination and input received from the Michigan State Historic Preservation Office (SHPO) and Tribal Historic Preservation Office(s) (THPO), if applicable, and Tribes who may have cultural or religious associations with the area, under Section 106 of the NHPA.
2. Discuss how each alternative may affect historical or archeological resources, including historic properties that are listed on the National Register of Historic Places or eligible for listing. Explain how FAA has and will continue to address input provided by the SHPO, THPO(s), and Tribes.
3. Describe the process for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items), and (2) complying with the Native American Graves Protection and Repatriation Act and the Archaeological Resources Protection Act, as applicable.

#### **5. SOCIOECONOMIC IMPACTS AND PUBLIC INVOLVEMENT**

- A. Consideration of the human environment is within the scope of NEPA's purpose to assure all Americans have access to safe, healthful, and productive surroundings.<sup>3</sup> The Draft EA should analyze if the proposed project, including alternatives, will significantly affect landowners, local communities, and/or Tribes.

##### **Recommendations for the Draft EA:**

1. Federal agencies should analyze socioeconomic, human health, and environmental effects based on the best available science and information on effects arising from exposure to pollution and other environmental hazards.
  - a. Disclose demographic information and identify the presence of communities that could experience adverse socioeconomic, human health, or environmental effects from the proposed project.
  - b. Include an analysis and conclusion regarding whether the proposed project or any alternatives may have potentially significant adverse effects on landowners with avigation easements, landowners of properties proposed for acquisition of new avigation easements, and local communities.

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<sup>2</sup> Impacts to CWA Section 303(d)-listed water bodies.

<sup>3</sup> See 42 U.S.C. § 4331(2).

- B. Outreach and public engagement are underlying pillars of NEPA. Given that the proposed project's activity would affect private property, EPA anticipates the forthcoming Draft EA will detail FAA's approach to solicit public comments from those affected by the proposed project.

**Recommendations for the Draft EA:**

1. Describe public involvement and targeted outreach<sup>4</sup> to seek public comment from communities within and adjacent to the project area and landowners on whose property the proposed obstruction removals would occur. EPA recommends FAA conduct outreach and provide project information in plain language.
2. Seek input regarding proposed mitigation measures and incorporate additional measures identified through public engagement with landowners and communities. For any significant adverse effects identified, consider mitigation measures consistent with NEPA.

**6. PROJECT STAGING**

- A. Careful project staging could minimize impacts and reduce permitting requirements while increasing safety and efficiency.

**Recommendations for the Draft EA:**

1. Consider impacts to existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, and stormwater and effluent discharge point sources) and how construction would impact or otherwise affect this infrastructure.
2. Provide maps and exhibits showing all contractor staging locations, access routes, and temporary road/mobilization locations.
3. Provide information pertaining to coordination with relevant state resource agencies regarding required permitting, as well as any required mitigation for proposed work.
4. Include actions to be employed to minimize construction impacts to air quality, water resources, soil (e.g., sediment and erosion control methods), and other regulated resources.

**7. NATURAL FEATURES**

- A. The Draft EA should address potential impacts related to the proposed clearing and/or grubbing and grading of forested land.

**Recommendations for the Draft EA:**

1. Include exhibits showing natural habitats that would be temporarily or permanently disturbed as a result of the proposed project.
2. Quantify the acreage of trees that would need to be removed from the project area. Develop a disposal management plan to address tree trunks removed from the landscape. Rather than burning trees, consider chipping the trees for airport or community use. EPA recommends trees not be burned due to negative effects on air

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<sup>4</sup> Consider engaging the public early and often, proactively seek full representation from the property owners and community, consider public comments and feedback, and incorporate feedback into the project.

- quality. If trees must be burned, determine if there are local or county restrictions on or requirements for open burning.
3. Discuss voluntary tree replacement. EPA recommends FAA commit to voluntary tree mitigation at a 1:1 ratio. Working with U.S. Fish and Wildlife Service (USFWS) and/or the Michigan Department of Natural Resources (MDNR) would help provide suitable native species and planting locations.
- B. Section 7 of the Endangered Species Act (ESA) directs all federal agencies to ensure that any action they authorize, fund, or carry out will not jeopardize the continued existence of a federally threatened or endangered species or to proposed or designated critical habitat for an identified species.

The USFWS Information for Planning and Conservation (IPaC)<sup>5</sup> tool can be used to identify potential federally listed endangered, threatened, and candidate species within the project area. IPaC can also be used to determine if Migratory Birds of Conservation Concern<sup>6</sup> may be found within the project area. There are at least four identified federally-endangered species, four federally-threatened species, two proposed federally threatened or endangered species, identified critical habitat, and at least 13 birds listed as Birds of Conservation Concern that have the potential to occur within the Project area.

**Recommendations for the Draft EA:**

1. Discuss the potential for impacts to both federally- and state-listed endangered, threatened, and candidate species for all action alternatives and the No Action alternative.
2. Document coordination and formal consultation in the NEPA document, with the goal of aligning NEPA and the ESA Section 7 consultation processes. Include results of coordination, recommendations, and stipulations with the USFWS and the MDNR regarding federal- and state-listed endangered, threatened, or candidate species or to critical habitat.
3. Discuss potential effects to wildlife resources from the proposed project including the potential effects that project activities may have on migratory bird breeding seasons, pathways, and habitat connectivity in the project area.
4. Include commitments to adhere to all USFWS and MDNR recommendations to protect species, including, but not limited to, seasonal work restrictions.

**8. NON-NATIVE INVASIVE SPECIES**

- A. Construction and earthmoving may allow for non-native invasive species to be brought into the project area on construction equipment.

**Recommendations for the Draft EA:**

1. Discuss how the proposed project will comply with Executive Order 13112: Safeguarding

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<sup>5</sup> The USFWS hosts the IPaC tool as a planning project tool to assist with the environmental review process, <https://ipac.ecosphere.fws.gov/>.

<sup>6</sup> Birds of Conservation Concern are species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act. See: <https://www.fws.gov/program/migratory-birds/species>.

the Nation from the Impacts of Invasive Species. Include a discussion of standard best management practices (e.g., washing construction equipment) that would be used to eliminate the spread of non-native invasive species into, as well as out of, the project area.

2. Discuss how Michigan guidelines on invasive species management requirements<sup>7</sup> will be incorporated into the proposed project.
3. Assuming non-native invasive species are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.

## **9. REASONABLY FORESEEABLE ENVIRONMENTAL EFFECTS**

- A. The impacts resulting from the proposed project's incremental impacts when added to the impacts of other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) undertakes such actions, should be analyzed.<sup>8</sup>

### **Recommendation for the Draft EA:**

1. Discuss potential reasonably foreseeable environmental effects to resources in the project area that could be affected by the proposed project.

## **10. INTERAGENCY COORDINATION/PERMITTING**

- A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including federal and state resource agencies, Tribes, and local governments. For all environmental impact categories requiring coordination with other federal and state resource agencies, EPA recommends copies of the FAA's letters to those agencies, as well as the responses from those agencies, be provided in the Draft EA.

### **Recommendations for the Draft EA:**

1. Include copies of all interagency coordination sent to, and received from federal and state resource agencies, Tribes, and local municipalities.
2. Include a list of all federal, state, and local permits that would be required to undertake the proposed project.

## **11. OTHER COMMENTS**

- A. The Draft EA should indicate how comments received during the scoping period were addressed.

### **Recommendations for the Draft EA:**

1. Create an appendix that includes all comments received during the scoping comment period, including any applicable transcripts of comments from the public.
2. EPA recommends that all project-related technical terms (e.g., avigation) be explained in plain language.
3. Create a chart that lists the following:
  - a. all comments received during the scoping and Draft EA review periods;

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<sup>7</sup> See <https://www.michigan.gov/invasives>

<sup>8</sup> See 42 U.S.C. § 4332(C)(ii).

- b. FAA's response with a reference to the Draft EA section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and
  - c. associated mitigation efforts with responsible entity, if applicable.
- 4. Create a chart listing proposed mitigation measures and specify which measures will become a commitment..
- 5. EPA recommends FAA access the following EPA resources to obtain environmental information related to the project area:
  - a. WATERS (Watershed Assessment, Tracking, & Environmental Results System):<sup>9</sup> <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
  - b. Envirofacts:<sup>10</sup> <https://www3.epa.gov/enviro/facts/multisystem.html>
  - c. NEPAassist: <https://www.epa.gov/nepa/nepassist>
  - d. CWA 303(d) Listed Impaired Waters: <https://mywaterway.epa.gov/>
  - e. National Ambient Air Quality Standards status: [https://www3.epa.gov/airquality/greenbook/anayo\\_mi.html](https://www3.epa.gov/airquality/greenbook/anayo_mi.html)

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<sup>9</sup> The Watershed Assessment, Tracking, & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases.

<sup>10</sup> Includes enforcement and compliance information.

**U.S. Environmental Protection Agency**  
**Construction Emission Control Recommendations**

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> EPA recommends FAA consider the following protective measures and commit to applicable measures in the Draft EA.

**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.).<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>3</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:

- 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.
- 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

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<sup>1</sup> Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. The Lancet. Oncology, vol. 13, no. 7, pp. 663-4. Accessed online from:

[https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim Tallaa 2012 Lancet Oncology.pdf](https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf)

<sup>2</sup> <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

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

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>4</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.
- 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.

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<sup>4</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.