MICHIGAN DEPARTMENT OF TRANSPORTATION
OFFICE OF AERONAUTICS

FINDING OF NO SIGNIFICANT IMPACT

for

RUNWAY 4/22 OBSTRUCTION REMOVALS

at

ST. CLAIR COUNTY INTERNATIONAL AIRPORT

PORT HURON, MICHIGAN

November 2025

1.0 Introduction

This Finding of No Significant Impact (FONSI) has been prepared for a proposed project at the St, Clair County International Airport (PHN or Airport). The Airport is a public-use, general aviation airport owned and operated by St. Clair County. The Airport is located approximately 54 miles northeast of Detroit in Kimball and St. Clair Townships, St. Clair County.

The attached Final Environmental Assessment (Final EA) has been prepared in accordance with Federal Aviation Administration (FAA) Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions.* Based on the evaluation of the Final EA, there are no potential significant impacts associated with the Airport's proposed project. Therefore, an Environmental Impact Statement (EIS) will not be prepared, and this FONSI is being issued.

This FONSI provides a review of the Airport's proposed project and the basis of the Michigan Department of Transportation Office of Aeronautics (MDOT AERO) findings. Expected environmental consequences of the proposed project and mitigation commitments are defined and described further in the Final EA.

A summary of the proposed project, which was evaluated in the attached Final EA, is as follows:

2.0 Airport Proposed Project

Michigan administers Airport Improvement Program (AIP) grants under the FAA's State Block Grant Program (SBGP). In accordance with the SBGP, authorized under 49 U.S.C. § 47128, and 14 C.F.R. Part 156, Michigan handles annual AIP grants that go to airports classified as "other than primary" airports, which includes PHN. The Airport is classified as a reliever airport in the 2023-2027 National Plan of Integrated Airport Systems. As part of its responsibilities under the SBGP, the state of Michigan assumes environmental review responsibilities for FAA AIP grants in the state.

Under the SBGP, the state of Michigan provides funding and oversight for the proposed project along with the responsibility for evaluating the potential environmental impacts of the project, consistent with the National Environmental Policy Act (NEPA) of 1969.

The Airport proposes to eliminate obstructions (trees) located off the ends of Runway 4/22. The proposed project is needed to provide unobstructed approaches to Runway 4/22 to meet FAA and MDOT AERO design standards for clear and unobstructed airspace.

The Airport's proposed project includes the following components:

- Removal of approximately 86 acres of forested land located in the Runway 4/22 approaches for current and future obstructions.
- Acquisition of avigation easements over 21 private parcels to allow for current and future obstruction removals in the Runway 4/22 approaches.

3.0 Project Purpose and Need

To enhance safety and utility of the Airport for current and future users, PHN proposes to remove obstructions (trees) located off the ends of Runway 4/22. The proposed project is needed to provide unobstructed approaches to Runway 4/22 to meet FAA and MDOT AERO design standards for clear and unobstructed airspace.

The need for the proposed project is based on data contained in the Airport Layout Plan and a recent Light Detection and Ranging (LiDAR) aerial survey that identified tree obstructions to various avigation surfaces at both ends of Runway 4/22. These obstructions require removal to comply with FAA guidance and to enhance safe operations at the Airport. Tree clearing is needed to rectify the identified obstructions to the Federal Aviation Regulation (FAR) Part 77 Imaginary Surfaces, Threshold Siting Surface (TSS), Precision Approach Path Indicator (PAPI) Light Signal Clearance Surface (LSCS) and Obstacle Clearance Surface (OCS), and State of Michigan Licensing Surface.

Specifically, the Airport cannot meet FAA safety standards outlined in FAA Order 5190.6B, Airport Compliance Manual, FAA Advisory Circular (AC) 150/5300-13B, Airport Design, and FAR Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace, due to trees that have grown over time to now become penetrations to the approach surfaces of Runway 4/22. These FAA standards establish runway design guidance for surfaces intended to protect the runway environment from objects that may interfere with aircraft operations. Airports have a responsibility to protect and maintain runway design surfaces so that objects do not become obstructions to aircraft operations.

Approximately 86 acres of obstruction clearing is proposed on both Airport-owned property and private property in the approaches of Runway 4/22. Potential obstructions are found on Airport-owned property, private property with existing avigation easements, and 21 private properties requiring new avigation easements before any trees are removed.

4.0 Alternatives Considered

In accordance with FAA Order 1050.1F, a range of reasonable alternatives were evaluated to address the purpose and need of the project. The analysis of these alternatives presented in the attached Final EA, was prepared to determine different options that may reasonably meet the needs of the Airport. The alternative that best met the project's purpose and need was carried forward as the Preferred Alternative while all other alternatives were dismissed. The range of alternatives that were considered included:

- No Action Alternative – No Removal of Current or Future Obstructions
  The No Action Alternative assumes that the existing trees identified as obstructions would continue to remain as penetrations to the FAR Part 77 Imaginary Surfaces, TSS, PAPI LSCS and OCS, and State of Michigan Licensing Surface, as presented in Chapter 1.0 Purpose and Need. Under this alternative, PHN would remain in its current state with no plans to remove obstructions in the Runway 4/22 approaches.

As such, the No Action Alternative does not meet the project's purpose and need of providing an air transportation facility that complies with FAA Order 5190.6B, Airport Compliance Manual. An airport that is not in compliance is at risk of reduced or no federal or state funding. In addition, mitigating hazards to air navigation is a critical mission for PHN, the FAA, and the MDOT AERO. For PHN to remain in compliance, PHN is required to address airspace hazards per Grant Assurance #20, Hazard Removal and Mitigation.

- Alternative 1 – Clear, Grub, and Grade Areas of Current and Future Obstructions in Upland and Wetland Areas in the Runway 4/22 Approaches

  Alternative 1 proposes to clear, grub, and grade approximately 86 acres of current and future obstructions to the FAR Part 77 Imaginary Surfaces, TSS, PAPI LSCS and OCS, and State of Michigan Licensing Surface off the ends of Runway 4/22.

  Obstructions on Airport property would be cleared first, followed by removal of identified obstructions only from private property with existing avigation easements. Easements will need to be negotiated before removal of obstructions can be accomplished on private properties without existing easements.

  Under this alternative, upland and wetland areas would be cleared and graded to create a level surface, and turf grass would be planted following removal of the trees and stumps. On private property, replacement trees of a low growing variety would be planted if desired by the homeowner. This alternative would create an area that PHN can easily maintain to prevent obstructions in the future.

  Implementation of Alternative 1 would allow PHN to remain in compliance with FAA Order 5190.6B, Airport Compliance Manual, and is part of PHN's ongoing effort to keep runway approaches free of potentially hazardous obstructions.

  Alternative 1 would have substantial impacts on wetlands due to proposed grubbing and grading activities. Field visits conducted in 2022 and 2023 to determine the presence of wetlands within the project area delineated or estimated a total of 105.549 acres of wetlands (66.024 acres of forested wetlands and 39.525 acres of scrub shrub, emergent, shallow marsh, excavated pond, and excavated ditch wetlands). Mitigation would be required for all wetland areas impacted by grubbing and grading activities and would include a Michigan Department of Environment, Great Lakes, and Energy (EGLE) Part 303 Wetland Protection Permit and the purchase of wetland credits at an EGLE approved mitigation bank within the same watershed. A total of 191.335 acres of mitigation is expected to offset impacts to area wetlands. Mitigation would consist of 132.048 acres of forested wetland impacts at a 2:1 ratio and 59.287 acres for all other wetland types at a 1.5:1 ratio.

  In addition to wetland impacts, surrounding forest cover and potentially suitable roost trees for the Tricolored Bat (TCB) and the Little Brown Bat, both of which are listed as

threatened by the State of Michigan, exist within the project area. The TCB is also proposed for federal listing as endangered under the Endangered Species Act of 1973. However, consultation with the U.S. Fish and Wildlife Service (USFWS) indicates tree removal restrictions as the appropriate mitigation. Tree removals would be restricted from May 15 through July 31. In addition, selective tree removals (i.e., individual trees) would be employed to the greatest extent possible, especially in areas where the obstruction density is low or in upland areas on private property with avigation easements.

Suitable habitat for the Eastern Massasauga Rattlesnake (EMR) is also present within the portion of the project area located outside the perimeter fence at the approach end of Runway 4 and could be impacted under Alternative 1. Appropriate mitigation would be implementation of recommended best management practices (BMPs) for projects within the known EMR range.

The total cost to implement Alternative 1 is estimated at $25.3 million ($4.3 million for construction and $21.0 million for wetland mitigation), which is considerably more expensive than Alternative 2.

- Alternative 2 – Clear, Grub, and Grade Current and Future Obstructions in the Upland Areas; Clear/Cut Current and Future Obstructions with No Ground Disturbance and No Removal of Understory Trees in Wetland Areas in the Runway 4/22 Approaches (Preferred Alternative)

  Under Alternative 2, approximately 86 acres of current and future obstructions to the FAR Part 77 Imaginary Surfaces, TSS, PAPI LSCS and OCS, and State of Michigan Licensing Surface would be cleared off the ends of Runway 4/22.

  Similar to Alternative 1, obstructions on PHN property would be cleared first. These areas would be followed by removal of identified obstructions only from private property with existing avigation easements. As previously explained, avigation easements only allow for the removal of identified obstructions. Easements would be negotiated before obstruction removals can be completed on private properties without existing easements.

  Grubbing and grading activities under this alternative would occur only in upland areas. Once the trees are cut and the stumps are grubbed, upland areas would be graded as needed to create a level surface, and replacement turf grass would be planted. On private property, replacement trees of a low growing variety would be planted if desired by the homeowner. This alternative would create upland areas that PHN can easily maintain to prevent obstructions in the future.

  In wetland areas, trees identified as current and future obstructions would be cleared, and stumps and understory trees would remain with no ground disturbance. Since stumps and understory trees would remain in the wetland areas, this alternative would

create lowland areas that PHN would have to periodically maintain to prevent regrowth in the future.

Similar to Alternative 1, implementation of Alternative 2 would allow PHN to remain in compliance with FAA Order 5190.6B, Airport Compliance Manual, and this alternative is part of PHN's on-going effort to keep its runway approaches free of potentially hazardous obstructions.

Alternative 2 would avoid mitigation of impacts to wetlands since no ground disturbance would occur, and no understory trees would be removed in wetland areas. As previously explained, field visits conducted to determine wetland boundaries delineated or estimated a total of 105.549 acres of wetlands in the project area (66.024 acres of forested wetlands and 39.525 acres of scrub shrub, emergent, shallow marsh, excavated pond, and excavated ditch wetlands). Recent consultation with EGLE indicates that a one-time removal of trees as proposed under Alternative 2 along with no ground disturbance and no removal of understory trees in wetland areas would require no mitigation of impacts to wetlands. A Part 303 Wetland Protection Permit from EGLE would still be required, however.

Alternative 2 would have potentially fewer impacts to the TCB, Little Brown Bat, and EMR than Alternative 1 given no ground disturbance and no removal of understory trees in wetland areas. USFWS bat mitigation is tree removal restrictions (tree removals would be restricted from May 15 through July 31) and selective tree removals for the bat species and implementation of BMPs for the EMR.

Alternative 2's estimated cost is approximately $3.9 million for construction, which is considerably less expensive than Alternative 1.

5.0 Preferred Alternative

After a thorough analysis of the advantages and disadvantages of each alternative, the alternative that best meets the project's purpose and need is Alternative 2 – Clear, Grub, and Grade Current and Future Obstructions in Upland Areas; Clear/Cut Current and Future Obstructions with No Ground Disturbance and No Removal of Understory Trees in Wetland Areas in the Runway 4/22 Approaches (Preferred Alternative).

Although both build alternatives meet the project's purpose and need, Alternative 2's primary advantage is that it avoids mitigation of impacts to wetlands, since grubbing and grading activities would be confined to upland areas only and understory trees would remain in wetland areas. Alternative 2 is subsequently much less expensive to implement than Alternative 1.

Similar to Alternative 1, Alternative 2 would have potential impacts on the TCB, Little Brown Bat, and EMR but given no ground disturbance and no tree understory removals, fewer impacts are expected. However, any impacts would be easily mitigated through tree removal restrictions and

selective tree removals for the TCB and Little Brown Bat and implementation of BMPs for the EMR.

Lastly, Alternative 2 would not provide a long-term solution to vegetation management in lowland areas, but this criterion is outweighed by the need to minimize environmental impacts to wetlands.

Based on the analysis presented above, Alternative 2 is considered the most reasonable alternative. As a result, Alternative 2 is carried forward in this Environmental Assessment for additional analysis, public comment, and agency review.

6.0 Public Review and Comment

Resource agencies and Native American tribes were contacted at the beginning of the project and given the opportunity to provide comment on the proposed action. A Public Meeting was also held at St. Clair County International Airport on October 22, 2025, from 5:30 PM to 7:00 PM. The purpose of the Public Meeting was to present the Preferred Alternative and its associated impacts to the public and receive written comments on the proposed action. Public and agency comments received have been incorporated into the EA where appropriate.

The Public Meeting 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 specific areas of interest. A printed open house guide was provided to inform guests of the station topics. According to the Public Meeting sign-in sheets, approximately four people attended the Public Meeting.

The legal public notice was advertised in two local newspapers prior to the Public Meeting. The notice was published in the Times Herald 31 days before the Public Meeting, and the Voice News 21 days before the Public Meeting. The public notice explained that the Draft EA was available for public review and comment and announced the date, time, and location of the Public Meeting. 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.

7.0 Environmental Consequences and Mitigation of the Preferred Alternative

This section presents an analysis of the expected impacts of the Preferred Alternative on the social, environmental, and economic environments of the area surrounding the Airport and also describes avoidance and mitigation measures to minimize impacts. Only those resources where impacts are anticipated, or mitigation is required, are described. For a comprehensive discussion of the environmental consequences of the Preferred Alternative see the attached Final EA.

- Air Quality

  The Airport is located in St. Clair County. According to the Environment, Great Lakes, and Energy (EGLE) Attainment Status for the National Ambient Air Quality Standards

(NAAQS) map, St. Clair County is an ozone attainment / maintenance area, with the southern part of the County also designated as a nonattainment area for sulfur dioxide. Also, according to the Environmental Protection Agency's (EPA's) Green Book National Area and County-Level Multi-Pollutant Information, St. Clair County is a maintenance area for PM-2.5 (2006). See **Appendix B – Air Quality** of the Final EA for EGLE and EPA air quality information and maps.

The implementation of the proposed project is also listed as Presumed to Conform under the following sections of Federal Register Vol. 72, No. 145, *Federal Presumed To Conform Actions Under General Conformity:*

- II. Existing Exemptions, *2. Routine Maintenance and Repair Activities [40 CFR 93.153(c)(2)(iv)]*, pg. 41567
- II. Existing Exemptions, *5. Actions (or Portions Thereof) Associated With Transfers of Land, Facilities, Title, and Real Properties Through an Enforceable Contract or Lease Agreement Where the Delivery of the Deed Is Required To Occur Promptly After a Specific, Reasonable Condition Is Met, Such as Promptly After the Land Is Certified as Meeting the Requirements of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and Where the Federal Agency Does Not Retain Continuing Authority To Control Emissions Associated With the Lands, Facilities, Title, or Real Properties [40 CFR 93.153(c)(2)(xix)]*, pg. 41568

Therefore, the Preferred Alternative is not anticipated to cause or contribute to any violation of the NAAQS. Temporary air quality impacts, such as the creation of dust from ground disturbing activities, may result from implementation of the Preferred Alternative, but long-term impacts are not expected. No impacts to air quality would result from implementation of the No Action Alternative.

Since there are no long-term impacts anticipated, no specific mitigation is proposed. However, to further reduce the potential for temporary air quality impacts for both workers and the surrounding area, the following Best Management Practices (BMPs) should be considered during tree removal activities under the Preferred Alternative where feasible:

- Use low-sulfur diesel fuel (less than 0.05 percent sulfur).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Position the exhaust pipe so that the diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Use catalytic convertors to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Use climate-controlled cabs that are pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operator's exposure to

diesel fumes. Pressurization ensures that air is moved from the inside to the outside. HEPA filters ensure that any incoming air is filtered first.

- Regularly maintain diesel engines, which is essential to keeping exhaust emissions low, and follow the manufacturer's recommended maintenance schedule. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel operators to perform routine inspections, and maintaining filtration devices.
- Purchase new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids as block heaters to warm the engine to reduce diesel emissions.

- Biological Resources

  A review of threatened and endangered species information provided in the USFWS' Information for Planning and Consultation (IPaC) database for the Area of Interest (AOI) identified ten federally endangered, threatened, proposed endangered, or proposed threatened species (**Table 1-0 USFWS Endangered and Threatened Species List**). The Rusty Patched Bumble Bee is also listed as endangered under the Act and is included in this list.

  A review of the IPaC database was coupled with use of the USFWS-directed Michigan Endangered Species Determination Key (DKey), which provided recommended effect determinations for species within the AOI. **Table 1-1 Recommended Effect Determinations from the Michigan Endangered Species Determination Key (DKey)** presents the recommended determinations. The USFWS verification letter is found in **Appendix C – Biological Resources** of the Final EA.

Table 1-0 USFWS Endangered and Threatened Species List		
Species Name	**Common Name**	**Status**
Myotis septentrionalis	Northern Long-eared Bat	Endangered
Myotis sodalis	Indiana Bat	Endangered
Calidris canutus rufa	Red Knot	Threatened
Sistrurus catenatus	Eastern Massasauga Rattlesnake	Threatened
Villosa fabilis	Rayed Bean	Endangered
Obovaria subrotunda	Round Hickorynut	Threatened
Simpsonaias ambigua	Salamander Mussel	Proposed Endangered
Epioblasma triquetra	Snuffbox Mussel	Endangered
Danaus plexippus	Monarch Butterfly	Proposed Threatened
Platanthera leucophaea	Eastern Prairie Fringed Orchid	Threatened
Bombus affinis	Rusty Patched Bumble Bee	Endangered

Source: USFWS Information for Planning and Consultation (IPaC) Database

Table 1-1 Recommended Effect Determinations from the Michigan Endangered Species Determination Key (DKey)		
Common Name / Species Name	**Status**	**DKey Determination**
Northern Long-eared Bat (Myotis septentrionalis)	Endangered	No effect
Indiana Bat (Myotis sodalis)	Endangered	No effect
Red Knot (Calidris canutus rufa)	Threatened	No effect
Eastern Massasauga Rattlesnake (Sistrurus catenatus)	Threatened	NLAA*
Rayed Bean (Villosa fabilis)	Endangered	No effect
Round Hickorynut (Obovaria subrotunda)	Threatened	No effect
Salamander Mussel (Simpsonaias ambigua)	Proposed Endangered	No effect
Snuffbox Mussel (Epioblasma triquetra)	Endangered	No effect
Monarch Butterfly (Danaus plexippus)	Proposed Threatened	No effect
Eastern Prairie Fringed Orchid (Platanthera eucophaea)	Threatened	No effect

*NLAA=May affect, but not likely to adversely affect
Source: Michigan Endangered Species Determination Key (DKey)

A database search of the Michigan Natural Features Inventory (MNFI) requested from EGLE as part of a Transportation Preliminary Database Search revealed no occurrences of state-listed threatened and endangered species, no Section 10 waterways, no Tier 1-designated eastern massasauga rattlesnake habitat, and no occurrences of Michigan Mussel Protocol Group 1/Group 2 mussels within the AOI.

The potential for impacts to federally threatened and endangered species within the AOI and recommended mitigation (if any) are discussed below.

Northern Long-eared Bat and Indiana Bat

The northern long-eared bat and Indiana bat is discussed in the subsections below.

Phase 1 Bat Habitat Assessments

Phase 1 bat habitat assessments were completed for the Northern Long-eared Bat (NLEB) and Indiana Bat (IBAT) according to guidelines presented in the USFWS' Range-Wide Indiana Bat & Northern Long-eared Bat Survey Guidelines for areas proposed for tree clearing. Field work for these assessments occurred over two site visits on June 6 –14, 2023, and September 25 – October 4, 2023.

Bat habitat requirements for the NLEB and IBAT are similar. Suitable summer habitat for the NLEB and IBAT is found at both ends of Runway 4/22 in areas outside of the perimeter fence.

The closed canopied, contiguous forested area within the Runway 4 AOI is dominated by tall (greater than 50 feet high) red maple, white pine, and black cherry with predominantly medium sized trees between 9- and 15-inches Diameter at Breast Height (DBH) and large trees greater than 15 inches DBH. Some large cottonwoods are also present in wetter areas; drier areas include paper birch. These mixed age stands generally have a varied and fairly open understory including immature cherry, sassafras, alder, white oak, shagbark hickory, and red oak. Multiple suitable snags are present in each of the areas assessed. Water resources are limited to seasonal availability in depressional areas; however, a perennial ditch does flow through the Runway 4 AOI, and there is a shallow marsh to the north of these areas that would provide availability to water during the summer months. This part of the Runway 4 AOI sees little human disturbance except for occasional off-road recreational activities.

In the Runway 22 AOI, suitable summer habitat is present though it is of a lower quality than that found in the Runway 4 AOI. Previous historic tree clearing in areas close to Smiths Creek Road has enabled invasive species to colonize including Oriental bittersweet, glossy buckthorn, and common reed. Several residences are located along the road. Still, there are large blocks of suitable habitat within the Runway 22 AOI, some of which are located on private property.

The swamp hardwood habitat that predominates in the less disturbed blocks provides seasonal availability to water resources. The area exhibits a closed canopy with a majority of trees greater than 50 feet tall and is dominated by large (greater than 15 inches DBH) red maple, cottonwood, and swamp white oak with a fairly cluttered understory of saplings and small trees. Multiple large snags are

present. Non-dominant trees are shagbark hickory, elm, paper birch, and American hornbeam.

Bat Acoustic Survey

A bat acoustic survey was initiated at the direction of USFWS to determine presence or probable absence of the federally endangered NLEB and IBAT and proposed federally endangered Tricolored Bat (TCB). The study followed survey protocols set forth in the 2024 Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines. The bat acoustic survey report is found in **Appendix C – Biological Resources** of the Final EA.

Initial software screening of detected calls identified nine species on at least one night of the survey including calls from NLEBs, IBATs, and TCBs. After qualitative analysis, the NLEB and IBAT were removed from the species list. Based on these results, the presence of these federally listed bats within the AOI is unlikely, and therefore, it was concluded that the proposed clearing of forest within the AOI is not likely to adversely affect these two federally listed species.

USFWS reviewed the bat acoustic survey report and concurred with its results and recommendations. USFWS indicated that tree clearing, and other activities associated with the project are unlikely to affect the NLEB and IBAT regardless of when tree removals occur.

However, qualitative analysis did verify two TCB calls and three little brown bat (Myotis lucifugus) calls, suggesting these species are present within the project area. In addition to being proposed for listing as endangered under the Act, the TCB is also listed by the State of Michigan as threatened. The little brown bat is also listed by the State of Michigan as threatened. Based on surrounding forest cover and the likelihood of an abundance of suitable roosts for the TCB, USFWS indicated that they do not expect the proposed project will adversely affect the TCB if the trees can be cleared outside the species' summer roosting period (May 15 through July 31).

Conclusion

In summary, the presence of the federally listed NLEB and IBAT is unlikely within the AOI, and therefore, the proposed project is not likely to adversely affect these two species. The presence of the state listed TCB and little brown bat, however, is documented by the acoustic survey. USFWS guidance is to conduct project activities outside the summer roosting period for the TCB (May 15 through July 31) to minimize incidental take of state listed bats. The USFWS recommended consultation with the Michigan Department of Natural Resources (MDNR) for concurrence; however, MDNR did not provide any comments when contacted.

In addition, selective tree removals (i.e., individual trees) will be employed to the greatest extent possible, especially in areas where the obstruction density is low or in upland areas on private property with avigation easements. In wetland areas, trees will be cut and removed but grubbing or other ground disturbance will be avoided.

Red Knot

The AOI provides limited habitat potential for this species. The AOI consists of open grassland, wet meadow, scrub-shrub, upland forests, and forested wetland. These habitats do not support the red knot's biological needs for food and stopover habitat. Therefore, the proposed project will have no effect on the red knot.

Eastern Massasauga Rattlesnake (EMR)

Although the AOI does not fall within habitat known to be occupied by, or with high potential to be occupied by, the EMR, it is within the known range of the snake. No occurrences of the EMR have been reported in St. Clair County.

Within the Runway 22 AOI is a mix of managed and unmanaged lands. Within the perimeter fence, regular maintenance keeps the area in a grassland state. While this habitat under different management conditions would be ideal upland habitat for the snake, regular maintenance and disturbance results in unsuitable habitat conditions.

North of Smiths Creek Road, a notable physical barrier to shadier wetland areas under tree canopy, the large, forested area is dense and is characterized by a closed canopy too shady to support the EMR's thermoregulation needs. Open sunny areas are extremely limited within this wooded area. Suitable habitat for the snake is not present in this area.

The highly managed areas on the airfield within the Runway 4 AOI are regularly mowed which, similar to the managed areas within the Runway 22 AOI, results in unsuitable habitat conditions.

Suitable habitat for the snake is present outside of the perimeter fence in the Runway 4 AOI. Intermixed open and shady habitats are available, depressional areas collect runoff and are supported by high water throughout most of the year, and component habitat with variable elevations are present. This part of the AOI sees little human disturbance except for occasional off-road recreational activities.

Clearing and grubbing activities will occur in upland areas only. Trees within wetlands, areas potentially used by the snakes as hibernation sites during the winter, would be cut and removed with limited ground disturbance. Tree removals will be conducted during the EMR's inactive period. No hydrologic alterations to groundwater levels are anticipated to occur during project activities and no ground disturbance is proposed in wetlands. Therefore, the proposed action may affect, but is not likely to adversely affect, the EMR.

Recommended BMPs for projects within the known EMR range will be implemented as follows:

- Use wildlife-safe erosion control materials.
- View the Michigan Department of Natural Resources' "60-Second Snakes: The Eastern Massasauga Rattlesnake" video and/or review the EMR fact sheet.
- Report any EMR observations (or any other threatened or endangered species) during project implementation.

Mussels

The snuffbox mussel, rayed bean, round hickorynut, and salamander mussel are discussed in the subsections below.

Snuffbox Mussel

Populations of the snuffbox mussel have declined precipitously across its widespread historical range. Extant populations, with few exceptions, are highly fragmented and restricted to short reaches. It was known to be present in a number of upper Midwest states including Michigan at the time of the species' listing in 2012.

In Michigan, occurrences of the mussel have been reported in the lower half of the Lower Peninsula, including St. Clair County, as recently as 2021.

The mussel is found in small- to medium-sized creeks, larger rivers, and in lakes. The species occurs in swift currents of riffles and shoals and wave-washed shores of lakes over gravel and sand with occasional cobble and boulders. Individuals generally burrow deep into the substrate, except when spawning or attempting to attract a host.

Rayed Bean

The historic range of the rayed bean, a freshwater mussel, included parts of the Midwest and eastern U.S. to as far north as Ontario, Canada. The mussel appears to be extirpated from a large part of its historic range and now consists of fragmented populations in Indiana, Michigan, New York, Ohio, Pennsylvania, and Ontario.

In Michigan, the rayed bean was found historically in St. Clair County in the Pine River, and in other eastern counties along Lake St. Clair and Lake Erie.

The rayed bean, like the snuffbox mussel, has seen its range severely diminished with live mussels only found in Michigan in the Pine River (St. Clair County) and Clinton River (Macomb County) in the last 20 years.

Similar to the snuffbox mussel, the rayed bean is typically found in small, shallow rivers with riffles, slow flowing rivers, or along shallow, wave-swept shorelines of

lakes. It prefers gravel or sand substrates and is often found in and around roots of aquatic vegetation.

Round Hickorynut

The round hickorynut is a wide-ranging mussel found in nine states in the middle part of the United States from Tennessee northward to Michigan and as far north as Ontario, Canada. In Michigan, occurrences of the mussel are found in the Lake St. Clair and Lake Erie watersheds.

The Round Hickorynut is typically found in medium to large rivers and along the shores of Lake Erie and Lake St. Clair, near river mouths. It is generally found in sand and gravel substrates in areas with moderate flow.

Salamander Mussel

Similar to the round hickorynut, the salamander mussel is found in scattered populations in the middle part of the United States from Arkansas to New York. While it is widely distributed, it is rare throughout its range. In Michigan, it is found in the southeastern border counties of the state within the Lake St. Clair and Lake Huron watersheds. Locally, it has been found in the Pine River in St. Clair County.

The mussel is found in medium to large rivers and lakes, usually in silt or sand under flat stones.

Conclusion

The MNFI Michigan Mussel Web App shows the modeled potential presence or absence for mussel species in streams based on occurrence data from the MNFI database and individual species conservation status. The rayed bean and snuffbox mussel are modeled in Stream Group 3 by the MNFI; the round hickorynut and the salamander mussel are modeled in Stream Group 2. Group numbers indicate applicable survey protocols for a particular mussel. The Pine River contains modeled habitat for mussels and is located about 1.5 miles to the west of the Airport and AOI. The river flows southerly eventually reaching the St. Clair River approximately 6.5 miles south of PHN in the City of St. Clair.

The AOI contains no modeled potential presence/absence streams on Airport property or within the AOI. A perennial excavated ditch is present within the Runway 4 AOI. This ditch is not a high-quality water source and does not contain suitable substrates for any of the identified mussels. No other perennial streams are within the AOI. Suitable habitat for identified mussels is not present within the AOI. In addition, no in-stream work is proposed for this project. Therefore, the proposed project will have no effect on these mussels.

Monarch Butterfly

Little suitable habitat is present within the AOI. This is in part due to the long history of vegetation maintenance activities on the airfield in both sections of the AOI and the predominance of forested areas not conducive to supporting the monarch's host plant. Open grassland areas are present within the Runway 4 AOI where several monarchs were noted during field work. However, little common milkweed was observed in these areas.

Proposed project activities will occur in forested areas and will not affect grassland areas within the AOI. Therefore, the proposed project will have no effect on the butterfly.

Eastern Prairie Fringed Orchid

In Michigan, reported occurrences of the Eastern Prairie Fringed Orchid generally are from counties in the southeast corner of the state south of Lake Saginaw. One disjunct occurrence from 1924 is reported from Cheboygan County on the northern tip of the Lower Peninsula. Two occurrences from St. Clair County are reported as recently as 2006.

The Eastern Prairie Fringed Orchid can be found in a wide range of wetland habitats. Due to the species' need for full sun exposure, it is generally restricted to grass- and sedge-dominated plant communities.

Known habitat associates of the orchid were identified within the Runway 4 AOI. Therefore, a meander search of potential suitable habitat for the orchid was conducted. This survey did not find evidence of the orchid. The moist and wet habitats within the meander search area needed to accommodate this wetland species were often overgrown with trees, shrubs, and invasive common reed. While this part of the AOI does provide some limited potential habitat, the orchid is considered not to be present. Therefore, the proposed project will have no effect on the orchid.

Rusty Patched Bumble Bee (RPBB)

The Rusty Patched Bumble Bee (RPBB) is historically associated with grasslands and tallgrass prairies of the Upper Midwest. This type of habitat provides nesting sites, overwintering sites, and nectar and pollen from an abundant array of forbs.

The AOI is within the historical range of the RPBB in Michigan; however, no occurrences of the RPBB are reported for St. Clair County. The current range of the RPBB in Michigan is mapped in the lower southeastern corner of the state and does not include St. Clair County.

Suitable foraging and nesting habitat are limited within the AOI in part due to the long history of vegetation maintenance activities on the airfield in both sections of the AOI and swamp hardwood forested wetland and mature upland forested areas not conducive to

supporting the bumble bee. Open grassland areas are present within the Runway 4 AOI but are limited. Therefore, the AOI provides limited potential habitat for the RPBB, and the proposed project will have no effect on the bumble bee.

- Hazardous Materials, Solid Waste, and Pollution Prevention

  In February 2025, a Phase I Environmental Site Assessment (ESA) in accordance with the American Society for Testing and Materials (ASTM) International Standard E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, was completed for the proposed obstruction removal areas in the approaches of Runway 4/22. ASTM defines Recognized Environmental Condition (REC) as the presence or likely presence of hazardous substances or petroleum products on the obstruction clearing areas under conditions that are indicative of an existing release, a past release, or a material threat of a release of hazardous substances or petroleum products into the structures on the obstruction clearing areas or into the ground, ground water, or surface water of the obstruction clearing areas. The term does not include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. For a copy of the Phase I ESA report, see **Appendix E – Hazardous Materials** of the Final EA.

  The Phase I ESA provided four findings of three separate sites. These findings are summarized below.

  Finding 1 – 177 Ash Drive – St. Clair County International Airport:
  - This finding is associated with the Airport property.
  - Given there is no evidence of a release associated with this finding and its only listing is in the Facility Registry Service/Facility Index database, no additional investigations or construction special provisions are recommended.

  Findings 2/3 – 5740 Gratiot Avenue – Former Cleet's Car and Salvage:
  - This finding is a former auto repair and salvage business and is shown to be on the subject property.
  - This finding is listed in multiple agency databases. A Baseline Environmental Assessment (BEA) was conducted in 2005 and found evidence of multiple releases of hazardous substances. Additionally, a Risk Conditions Classification assessment was completed in 2023 and found the potential for exposure or threat to human health, safety, or welfare, or to the environment, or sensitive environmental receptors in the long term. The BEA indicates alternative approaches to continuing operations of the site for the purposes of distinguishing a past release from a new one. No records Indicate mitigation has occurred.
  - A Phase II ESA and construction special provisions are recommended if this site is developed.

Finding 4 – 5640 Gratiot Avenue – Welser Well Drilling:

- This finding is associated with a residential home and commercial business.
- Two 1,000-gallon underground storage tanks (USTs) were removed from the site in 1989.
- No additional investigations or construction special provisions are recommended.

The FAA has not established a significance threshold for hazardous waste, solid waste, or pollution prevention. However, the FAA 1050.1F, *Desk Reference* offers guidance to consider whether the proposed project could:

- Violate any laws or regulation regarding hazardous waste.
- Involve a contaminated site, or if actions within a contaminated site are appropriately mitigated.
- Produce an appreciable amount of hazardous waste.
- Generate a different quantity or type of solid waste that could exceed local capacity or use different methods of collection and disposal.

Findings 2/3 at 5740 Gratiot Avenue is located in the project area at the approach end of Runway 4 and is currently in use as a private residence. As explained above, the site was formerly an auto garage and salvage yard.

This parcel is long and narrow and there was limited visibility from the public right-of-way during the site reconnaissance. The property was cluttered with solid waste (junk). Various recreational campers, tires, scrap metal, and wood were observed on the property. No tanks or drums were observed. No evidence of stained soils, stressed vegetation, landfilling, or foul odors were noted, although the ground was snow covered, and observations were made from the public right-of-way. The property was not accessed. Aerial imagery showed various areas of debris.

Findings 2/3 is identified in the Environmental Risk Information Services (ERIS) Database Report in the databases below.

WASTE

This database contains records from the Waste Data System, which tracks activities regulated by the Solid Waste, Scrap Tire, Hazardous Waste and Liquid Industrial Waste programs. No further information was provided.

SPILL

This database contains records from the Pollution Emergency Alerting list maintained by EGLE. This listing tracks environmental damages and pollution. The SPILL database identifies a spill at Findings 2/3 in July 2021. An unknown quantity of diesel fuel, vehicle liquids, and components were released. No further information was available regarding containment methods, spill location, or physical characteristics of the area the spill occurred.

BEA

This database contains records from EGLE. A BEA allows people to purchase or begin operating at a facility without being held liable for existing contamination. BEAs are used to gather enough information about the property being transferred so that existing contamination can be distinguished from any new releases that might occur after the new owner or operator takes over the property.

State Hazardous Waste Sites (SHWS)

A Part 201 Facility is an area, place, or property where a hazardous substance in excess of the concentrations that satisfy the cleanup criteria for unrestricted residential use has been released, deposited, disposed of, or otherwise comes to be located. This list is maintained by the Remediation and Redevelopment Division in EGLE. The SHWS database serves a purpose similar to that of the federal Superfund Enterprise Management System (SEMS), functioning as a state-level counterpart for tracking potential hazardous substance release sites.

The BEA completed in 2005 for the site at Findings 2/3 found extensive debris including cars, trucks, tires, storage tanks, oil drums, and other scrap throughout the property. Records show this property was operated as a junk yard since the 1980s. Per the BEA, approximately eight (8) 250-gallon aboveground storage tanks and approximately 100 automotive fuel tanks were observed across the property. Basic maps included in the BEA offer an idea of where sources of potential releases are located on the property. Additionally, soil sampling was done in key locations near areas of observed hazardous substances. Soil samples found an array of hazardous substances, most with concentrations beyond the threshold that require mitigation. The BEA concluded that based on observations and soil sampling, hazardous substance releases had occurred.

Furthermore, the EGLE database contains a Remediation Information Data Exchange (RIDE) form for this finding from March 2023. This risk conditions classification form indicates the following:

- RIDE Risk Category: Risks Present and Require Action in the Long Term
    - Based on the site's Conceptual Site Model (CSM) and migration of contaminants, there is a potential for exposure or threat to human health, safety, or welfare, or to the environment, or sensitive environmental receptors in the long term. For the purpose of classification, potential exposures or threats considered to be long-term generally are greater than two years.
- Direct Contact: Risks Present and Require Action in the Short Term
    - Soil contamination at less than or equal to 3 feet below the ground surface that could typically be encountered by the public or by landscaping activities exceeds the direct contact criteria.

- Ground Water-Surface Water Interface (GSI)
    - The ground water contaminant plume exceeds GSI criteria, and the leading edge of the contaminated ground water plume is located more than two years' ground water travel time from a surface water body, or the plume is entering a storm sewer and the contamination will reach the outfall of the storm sewer in more than two years.

The Phase I ESA report concluded that Findings 2/3 at 5740 Gratiot Avenue is a REC given that there is evidence of a past release of various hazardous substances on the property. Given the context and scope of the proposed project, the use of special provisions and a change to the proposed action (e.g., no ground disturbance) may be warranted in lieu of a full Phase II ESA. The Phase I ESA provided the following sample special provision language to be used in contract documents for Findings 2/3:

> ***Notice to Contractor – Contaminated Soil Locations***
>
> *It is presumed that due to the previous known release of hazardous substances, contaminated soil exists within the proposed action area. Contaminated soils are likely present at the following site:*
>
> *1. 5740 Gratiot Avenue, St. Clair, MI 48079. Tax Parcel ID #: 74-30-003-3006-000*
>
> *The contaminated soil at the above site is expected to be within the excavation limits necessary to complete the work under this project. Control construction operations at this location to restrict any ground disturbance, including the use of heavy machinery. Construction work must be limited to dry conditions only to prevent the unintended ground disturbance that is likely in wet conditions. If contaminated soils are encountered at this site or elsewhere on the project during excavation, terminate excavation in the area and notify the engineer.*
>
> *A change to the proposed action may be warranted in lieu of a full Phase 2. This includes altering the proposed action of clearing and grubbing to just aboveground removal of obstructions (trees). Specifically, within the area of contamination, obstructions (trees) should be felled at six inches to one-foot above ground without ground disturbance. Resulting stumps should be left undisturbed by the contractor.*

It is also recommended that the contractor consider wearing personal protective equipment (PPE) such as rubber boots and rubber gloves during project activities on the property at 5740 Gratiot Avenue.

In addition to the potential for hazardous materials at Findings 2/3, tree removal activities associated with the Preferred Alternative have the potential to create solid waste material (tree debris). Tree debris will be removed and preferably sold or offered to parcel owners, as appropriate.

The contractor will be required to have a Spill Prevention, Control, and Countermeasure (SPCC) plan in place to be implemented if a spill occurs during tree removal activities. An approved erosion control plan is also required to provide a collection area for non-recyclable waste. Any waste generated through proposed project improvements will be disposed of in compliance with all federal, state, and local regulations.

In conclusion, there is the potential for hazardous materials impacts from implementation of the Preferred Alternative. There would be no hazardous materials impacts from implementation of the No Action Alternative.

- Wetlands

  In wetland areas, trees identified as current and future obstructions will be cleared and stumps and understory trees and vegetation will remain with no ground disturbance under the Preferred Alternative. Since stumps and understory trees and vegetation will remain in wetland areas, the Preferred Alternative will create lowland areas that PHN will have to likely maintain to prevent regrowth in the distant future. Although a total of 105.549 acres of wetlands were delineated or estimated within the AOI, mitigation of impacts to wetlands will be avoided under the Preferred Alternative.

  Recent consultation with EGLE indicates that a one-time removal of trees as proposed under the Preferred Alternative along with no ground disturbance and no removal of understory trees in wetland areas will require no mitigation of impacts to wetlands. A Part 303 Wetland Protection Permit from EGLE will still be required, however.

  In addition to obtaining a Part 303 Wetland Protection Permit, all delineated wetlands will be shown on construction plans to protect them from any possible direct or indirect impacts and construction documents will require avoidance and erosion control measures.

  The Preferred Alternative is expected to have adverse wetland impacts; however, these impacts will not require mitigation beyond the permitting process.

- Surface Waters

  The site visits conducted to delineate wetlands found a number of streams in the project area, totaling 6,162.642 linear feet. They are steep-sided, excavated ditches that convey drainage from Airport property ultimately to the Moak Drain or are parts of the Moak Drain itself. Slow flowing water was found in these ditches at multiple site visits. Wetland 37(X)

was observable from Airport property and was approximately 10 - 15 feet wide with water to an unknown depth, likely more than two feet deep.

No impacts to the excavated ditches are anticipated beyond tree clearing activities.

Soil erosion is a source of concern due to possible adverse impacts to surface waters from construction projects. Since the Airport site is generally flat, there is not expected to be a high risk of soil erosion during ground disturbing activities. However, some amount of erosion may occur during tree removals, which will be minimized using appropriate BMPs. The following list of BMPs represents common erosion control measures that should be considered during tree removals and applied where applicable:

- Sediment traps
- Temporary cement ponds
- Temporary grassing of disturbed areas
- Vegetation cover replaced as soon as possible
- Erosion mats and mulch
- Silt fencing and drainage check dams
- Settling basins for storm water treatment

All excavated soils and staging areas for construction equipment will be placed in non-sensitive upland areas with disturbed areas replanted as soon as possible to reduce the likelihood of erosion.

Mitigation measures prepared under an erosion control plan, in accordance with FAA AC 150/5370-10H, *Standard Specifications for Construction of Airports*, will help minimize long-term impacts to area water quality and to the existing drainage system.

In accordance with Part 91, Michigan Soil Erosion and Sedimentation Control of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, a soil erosion permit and a stormwater runoff control permit are required from the City of Midland.

The Airport is also required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activity disturbing one acre or more of soil. Permittees are required to control runoff from construction sites and develop a construction Stormwater Pollution Prevention Plan (SWPPP) that includes erosion prevention and sediment control BMPs.

Surface water impacts from implementation of either the Preferred Alternative or the No Action Alternative are not anticipated.

- Ground Water

  The EGLE maintains several databases of water wells and wellhead protection areas in Michigan. According to EGLE's Open Data GIS dataset for water wells in the east central Lower Peninsula, there are several drinking water wells within the limits of the project area at the approach ends of Runway 4 and Runway 22. There will be no direct impacts to these wells, however.

  The wells will be flagged in the field during tree removals and will be marked on construction plans to ensure they are avoided. If it is determined during final design that there will be impacts to any wells during project implementation, the wells will be relocated in accordance with state and local regulations.

8.0 MDOT AERO Finding

Michigan administers Airport Improvement Program (AIP) grants under the FAA's State Block Grant Program (SBGP). The SBGP, authorized under 49 U.S.C. § 47128, and 14 C.F.R. Part 156, allows the state of Michigan to assume environmental review responsibilities for FAA AIP grants in the state. After careful and thorough consideration of the facts contained in the attached Final EA, the undersigned MDOT AERO representative finds the proposed action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the NEPA and other applicable environmental requirements and will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to Section 102(2)(C) of NEPA.

APPROVED: B.B. DISAPPROVED: _____

E-SIGNED by BRYAN BUDDS
on 2025-11-17 12:47:32 EST

_____

Responsible MDOT Official Title

Michigan Department of Transportation Office of Aeronautics

Date: _____