Terminal Rehabilitation, Modernization and Energy Improvement Project
Bemidji Regional Airport
Bemidji, Minnesota

Final Environmental Assessment

U.S. Department of Transportation
Federal Aviation Administration
Bemidji Regional Airport Authority

June 2009

This environmental assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

[Signature]
Responsible FAA Official

[Signature]
Date
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1.0 Introduction

An environmental assessment (EA) is a concise public document used to describe a proposed action’s anticipated impacts by briefly providing sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact (40 CFR 1508.9 and Order DOT 5610.1C (July 13, 1982)). The Bemidji Regional Airport Authority (BRAA) has sponsored this Federal EA to assess the potential environmental impacts related to proposed improvements at the Bemidji Regional Airport (BJI). If the Federal Aviation Administration (FAA) evaluation of the EA determines that the proposed action will not result in impacts requiring an Environmental Impact Statement, they shall prepare a Finding of No Significant Impact (FONSI).

The Bemidji Regional Airport is located in the City of Bemidji in Beltrami County, Minnesota as shown in Figure 1 (figures are in Appendix A).

2.0 Proposed Action

The proposed action is the approval of the Proposed Project for construction and use.

2.1 Proposed Project

The Proposed Project, shown on Figure 2, consists of the following:

- Expansion of the existing terminal from 13,064 to 28,738 sq. ft. to provide additional space for passenger boarding and deplaning, waiting, ticketing, rest rooms, security screening, concessions, and baggage handling;
- Construct one additional gate (for a total of two gates);
- Provision of two all-weather jet boarding bridges;
- Replacement of majority of the mechanical system to comply with current energy codes;
- Replacement of lighting and other electrical components with new energy efficient systems;
- Expansion and rehabilitation of existing Air Rescue and Fire Fighting (ARFF) building

The Proposed Project in the February 2009 Draft EA included a proposed expansion of the parking lot, which would require removal of the Civil Air Patrol (CAP) building to provide space for the parking lot expansion, and CAP activities would be moved to the existing building used by the Bemidji Gun Club, which would relocate off airport. The Gun Club has been unable to obtain expected funding to develop at the new site and recently requested BRAA to delay the parking lot expansion. In addition, BRAA was hopeful that the terminal and parking lot projects would be eligible for the federal stimulus funds, and accelerated the parking lot project accordingly. This has not occurred and there are no federal funds to implement the parking lot project. Therefore, this project has been deferred to the future when the decision to proceed with its development is ripe. A separate EA will be prepared at that time. The terminal expansion project has independent utility; it is not connected to the parking lot expansion. Impacts of the parking lot expansion that are cumulative with the terminal expansion are provided in Section 6.19, Cumulative Effects.
2.2 Permits and Approvals
The known permits and approvals anticipated to implement the Proposed Project are provided in Table 1.

Table 1: Permits and Approvals

<table>
<thead>
<tr>
<th>Unit of Government</th>
<th>Activity</th>
<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal</td>
<td>Review of Airport Layout Plan (ALP) Revision</td>
<td>Approval</td>
</tr>
<tr>
<td></td>
<td>Airport Improvement Program Funding</td>
<td>Approval</td>
</tr>
<tr>
<td></td>
<td>Review of Environmental Assessment</td>
<td>Approval and Finding of No Significant Impact (FONSI)</td>
</tr>
<tr>
<td>State</td>
<td>Phase II National Pollutant Discharge Elimination System (NPDES) Construction Permit</td>
<td>Issuance of Permit</td>
</tr>
</tbody>
</table>

2.3 Requested Federal Action and Schedule
The requested Federal action is environmental approval of the proposed project and approval of the ALP in order for BJI to establish eligibility to participate in funding through use of Federal Airport Improvement Program funds for eligible airport development, assuming the independent requirements of this program are met (49 U.S.C. Section 47101 et seq., 49 U.S.C. Section 40117). Subject to completion of the Federal environmental approval process and the availability of funding, construction of the proposed project would commence in 2009. The project could be completed in 2010.

3.0 Purpose and Need
In the existing terminal building, the ticketing counter; Transportation Security Administration (TSA) passenger screening and waiting areas; and the boarding gate are in the center of the building, as shown on Figure 2. Baggage claim, rental car counters, rest rooms, and a TSA office are on the westerly side of the building while FAA facilities, the airport manager’s office, a conference room, and a maintenance room are on the easterly side. Opposite the passenger waiting area, facing the parking lot is a vending area with seating for about 15 people.

3.1 Need
The Bemidji Regional Airport Master Plan, prepared in May 2007, addressed the need for the proposed project. The existing terminal space is inadequate to accommodate existing and forecast passenger levels. The Master Plan recommended expanding the terminal to better meet current passenger levels and accommodate the future growth contained in the Master Plan forecasts shown in Table 2.
Table 2 – Peak-Hour Forecasts

<table>
<thead>
<tr>
<th></th>
<th>2003</th>
<th>2008</th>
<th>2013</th>
<th>2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Peak-Hour Passenger Traffic</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enplanements</td>
<td>30</td>
<td>31</td>
<td>39</td>
<td>45</td>
</tr>
<tr>
<td>Deplanements</td>
<td>30</td>
<td>31</td>
<td>39</td>
<td>45</td>
</tr>
<tr>
<td>Total Passengers</td>
<td>50</td>
<td>52</td>
<td>65</td>
<td>75</td>
</tr>
<tr>
<td><strong>Peak-Hour Aircraft Operations</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peak-Month Aircraft Operations (11.2 percent of Annual Ops)</td>
<td>1,269</td>
<td>1,279</td>
<td>1,295</td>
<td>1,318</td>
</tr>
<tr>
<td>Average Day Peak Month (ADPM) Operations</td>
<td>41</td>
<td>41</td>
<td>42</td>
<td>43</td>
</tr>
<tr>
<td>Peak-Hour Aircraft Operations (20 percent of ADPM)</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>9</td>
</tr>
</tbody>
</table>

Sources: Airport Records & Surveys (March 2004) and HNTB Analysis

The existing terminal square footage is inadequate to accommodate existing and future passenger activity. Prior to the events of 9/11/2001 there was no security screening at BJI; it was performed at MSP when the passengers deplaned. Subsequently, the terminal passenger area was rehabilitated in 2002 to accommodate 30 passengers in a newly created security area, which resulted in reduced square footage for other general passenger use and milling areas. The current security area is unable to accommodate increased passenger boarding due to the expected change in aircraft equipment (from the existing 35-seat Saab 340 to the 50-seat Canadian Regional Jet (CRJ) 200). There is inadequate space in the terminal to accommodate the forecasted 75 peak-hour passengers: the existing space can accommodate only 48 peak-hour passengers. The existing space is deficient in number and size of rest rooms (no rest rooms in the security area), seating, concessions, rental car counters, space for visitors, general circulation space, office space, ticketing, baggage handling and baggage claim. Occasional use by large commercial jets (737’s) also presents substantial passenger boarding/deplaning demands.

On the airfield side, the terminal has one gate and therefore is able to accommodate only one aircraft at a time. Future forecasts indicate that the terminal will need two gates to accommodate two aircraft simultaneously, in a taxi-in/taxi-out configuration. There is also a lack of an all-weather boarding/deplaning bridge, which will be needed for the two gates.

The majority of the terminal’s mechanical system does not comply with current energy codes and the lighting and other electrical components are inefficient in the use of energy.

The existing airport is outside of the City of Bemidji 10-minute response time for structural fires. Therefore, it is proposed to expand the ARFF building so that a fire truck capable of fighting structural fires can be stationed at the airport. The truck will also be available to meet FAA fire fighting criteria for the random occasions when a commercial aircraft with greater than 60 passengers uses the airport.
3.2 Purpose
The project has the following purpose/objectives:
1. to provide sufficient terminal space to accommodate existing and forecast passenger activity, including boarding and deplaning, waiting, ticketing, rest rooms, security screening, concessions, baggage handling and baggage claim,
2. to provide one additional gate and all-weather jet boarding bridge at each gate,
3. to provide a mechanical system that complies with current energy codes and energy-efficient electrical components, and
4. to provide space for a fire truck capable of fighting structural fires on the airport.

4.0 Alternatives

4.1 Alternatives under Consideration
The alternatives under consideration are the Proposed Project described in Section 2.1 and the No Action Alternative. The No Action Alternative consists of the existing facilities on the airport shown in Figure 3.

4.2 Comparison of Alternatives
The Proposed Project would achieve the purpose and need for the project, whereas the No Action Alternative would not. Under the No Action Alternative, the airport would continue to have an inadequate terminal. Neither alternative would have an adverse impact on the environmental impact categories presented in Section 6.0.

5.0 Affected Environment
The purpose of this section is to provide the general setting of the area affected by the Proposed Project. The environment affected by each specific environmental impact category can vary widely. A description of the conditions within the environmental impact categories affected by the Proposed Project is presented in Section 8, Environmental Consequences.

5.1 General Setting
The Bemidji Regional Airport (BJI) is located on the northwestern edge of the City of Bemidji in Beltrami County. The Airport covers about 1,500 acres and is located within the Bemidji city limits, three miles northwest of downtown. It began as a City Airport and became a joint city-county airport in 1980. A certified Part 139 airport, BJI is currently served by Mesaba Airlines Saab 340 turbo props and enplanes over 30,000 people a year (4th highest in the State). In 2003 there were approximately 11,500 operations and 48 aircraft based at the airport.

Land use on the north, west, and southwest sides of the airport is primarily undeveloped woodlands, with some scattered residential and industrial uses. Land use to the east is a combination of industrial, residential, and undeveloped woodlands.

The area to the southeast, centered on the intersection of U.S. Trunk Highways 2 (Paul Bunyan Drive) and 71 (both 4-lane divided highways), is a vibrant and growing commercial use area,
with many retail stores, restaurants, and car dealerships. In the mid-to-late 1970s, the roadways in the vicinity of the TH 2 and TH 71 intersection were improved. Today, the TH 2 – TH 71 intersection is the main east-west intersection in North Central Minnesota, and the traffic volume has steadily increased over time. This traffic volume has and will continue to result in intense development pressure.

5.2 Future Actions

Current airport plans call for the expansion of the parking lot, construction of new individual aircraft hangars and associated taxiways, and business development shown on Figure 5. There are no other known projects or actions proposed in the immediate vicinity of BJI.

6.0 Environmental Consequences

This section assesses the environmental impacts of the proposed project and alternatives under consideration, in accordance with the policies and procedures contained in FAA Order 5050.4B and FAA Order 1050.1E for compliance with the National Environmental Policy Act (NEPA) and implementing regulations issued by the Council on Environmental Quality (CEQ) found in 40 CFR parts 1500-1508. FAA Order 1050.1E provides direction on using the NEPA review process to ensure compliance with other environmental laws, regulations and executive orders that may be applicable to proposed FAA actions.

6.1 Air Quality

The two primary laws that apply to air quality are NEPA and the Clean Air Act, as amended (CAA). The FAA is required under NEPA to prepare an environmental review document for Federal actions that have the potential to affect the quality of the human environment including air quality. The CAAA established National Ambient Air Quality Standards (NAAQS) for six pollutants, termed “criteria pollutants.” The six pollutants are carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM-10 and PM-2.5) and sulfur dioxide (SO₂). The CAAA requires each state to adopt a plan approved by the EPA — called the state implementation plan — to achieve the NAAQS for each criteria pollutant. The proposed action’s impact on air quality in a NEPA document is normally assessed by evaluating the impact of the proposed action on the NAAQS. Therefore, Federally sponsored airport development in Minnesota must conform with the Minnesota State Implementation Plan (SIP) in accordance with the criteria and procedures established in the SIP as specified by EPA in 40 CFR Part 51, Subpart W — Determining Conformity of General Federal Actions to State or Federal Implementation Plans. According to Subpart W, a conformity determination (with the SIP) is required for each criteria pollutant if the emissions in a non-attainment or maintenance area for that pollutant caused by a federal action (proposed action) would equal or exceed a specified annual emission rate when compared to the no action alternative or would be 10% or more of the non-attainment or maintenance area’s emission inventory for that pollutant in the SIP.

The Proposed Project is not within a non-attainment or maintenance area for a criteria pollutant; a general conformity determination is therefore not required. A comparison of the proposed
project’s resulting air quality with NAAQS should be considered if pollutant levels are likely to exceed the NAAQS.

The number of passengers at larger commercial airports and the level of general aviation and air taxi operations at smaller airports are likely to be good indicators of potential pollutant concerns. For airports, a main pollutant of concern from an air quality standpoint is CO. Cars and aircraft (especially GA) emit moderate amounts of CO while they are idling or taxiing, respectively. Significant road congestion or airport ground delays could potentially cause CO emissions to approach the NAAQS. Actions that would not increase airport capacity, lead to increased congestion of roadways or airfields, or relocate aircraft or vehicular activity closer to sensitive receptors are not likely to exceed the NAAQS for CO. FAA guidance in Order 1050.1E, Section 2.4b, states that procedures for air quality analyses are provided in the FAA report “Air Quality Procedures for Civilian Airports and Air Force Bases”. That report states that a NAAQS assessment is required if a project at a commercial service airport would have forecasted activity of more than 1.3 million annual passengers or more than 180,000 annual general aviation (GA) operations. The 2013 forecast prepared by HNTB Corporation in 2004 for the BJI master plan update was 3,830 for scheduled commercial passengers and 11,560 for GA operations. The Proposed Project would not change the 2013 forecast, which is considerably less than the cited thresholds and a NAAQS assessment is therefore not required.

6.2 Coastal Resources
The Coastal Barriers Resources Act (CBRA), the Coastal Zone Management Act (CZMA) and Executive Order (E.O.) 13089, Coral Reef Protection, govern federal activities involving or affecting coastal resources. The CBRA, as amended, prohibits federal financing for development within the Coastal Barriers Resources System, which consists of undeveloped coastal barriers along the Atlantic and Gulf coasts and along the shores of the Great Lakes, including Lake Superior in St. Louis County, Minnesota. The CZMA requires that a proposed action be consistent with approved coastal zone management programs.

The BJI Airport, located in Beltrami County, is sufficiently distant from these designated lands along the shore of Lake Superior so as not to be included.

The BJI Airport is not within a federally designated coastal barrier area or coastal zone or coral reef area; therefore, analysis of the Proposed Project and No Action Alternative with respect to the CBRA, CZMA and E.O. 13089 is not applicable.

6.3 Compatible Land Use
The compatibility of existing and planned land uses in the vicinity of an airport is usually associated with noise impacts related to the airport in addition to the land use planning of the affected jurisdiction, and would be analyzed as such in this section.

Land Use Compatibility Criteria
FAA’s most recent compatible land use guidelines are contained in Appendix A of FAR Part 150. Residential and school uses are incompatible at DNL 65 or greater. The affected environment is the area within the DNL 65 contour in addition to the land uses on the Airport. As discussed in Section 6.13, Noise, there are no noise-sensitive land uses in the DNL 65
contour, which lies entirely on airport property. The Proposed Project would not change the number of annual aircraft operations from those of the No Action Alternative. Therefore, the noise levels on land use within the DNL 65 noise contour from the Proposed Project are identical to those of the No Action Alternative and there is no impact.

The Proposed Project and No Action Alternative are consistent with Beltrami County’s adopted Comprehensive Plan and land use planning of the City of Bemidji.

6.4 Construction Impacts
Construction impacts are short-term, occurring only during the period when the contractors, personnel, and equipment are operating at the Airport.

Construction of the project would require a Phase II NPDES Construction Permit from the MPCA; again, this would be verified during final design. No dewatering is anticipated as part of the project.

Dust and noise could be associated with the construction of the project. The following measures to minimize noise and dust emissions would be incorporated into the construction procedures. During construction, the contractor shall comply with applicable state and local noise ordinances or restrictions, provide advance notice to affected communities for any necessary abnormally loud construction activities (pile-driving, jack hammers, etc.), and properly muffle construction equipment.

Potential temporary air quality impacts from construction include fugitive dust associated with site work and haul routes, exhaust and machinery-related emissions from construction equipment and haul vehicles, and potential vehicular congestion in the vicinity of construction sites and on haul routes. Contractors would be required to mitigate construction/grading activities disrupting ground cover by controlling fugitive dust emissions and other airborne particulates in accordance with specifications including measures such as applying water to exposed soils, and limiting the extent and duration of exposed soil conditions. All contractors would be required to conform to all applicable federal, state, and local regulatory requirements.

The terminal building was constructed in 1992 with materials that did not contain asbestos. The construction contractors will be required to remove all waste materials generated during construction. Surface soil erosion would be managed with silt fence and hay bales as required to secure borrow sites and grading areas. Also, re-vegetation of areas disturbed by construction activity would take place as soon as possible.

Heavy equipment used during construction would require fueling, routine maintenance and, potentially minor repairs while on site. There is a risk of minor spills or leaks of petroleum products during maintenance and equipment refueling. This risk is typical of any construction project involving similar activities. The contractor is responsible for the implementation of measures to prevent petroleum spills and the reporting and clean-up requirements for any petroleum spills that occur during construction.
6.5 Department of Transportation Act, Section 4(F)

This section considers the impacts of the airport alternatives on resources eligible for review under Section 4(f) of the 1966 Department of Transportation Act. \(^1\) Section 4(f) states that the Secretary of the U.S. Department of Transportation may not approve a project that requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land in an historic site of national, state or local significance. The act requires that no project be approved unless there is no feasible and prudent alternative to using that land and planning for the project includes all possible measures to minimize harm resulting from the use of the land.

The affected environment is the airport property. There are no Section 4(f) resources affected by the Proposed Project and No Action Alternative.

6.6 Farmlands

The Farmland Protection Policy Act (FPPA) regulates Federal actions with the potential to convert farmland to non-agricultural uses. If the land to be acquired is not planned or zoned as farmland, it is not protected by the FPPA and therefore there would be no effect on farmlands.

There is no farmland affected by the Proposed Project and No Action Alternative.

6.7 Fish, Wildlife and Plants

Section 7 of the Endangered Species Act (ESA), as amended, applies to Federal actions and sets forth requirements for consultation to determine if the proposed action may affect an endangered or threatened species. If a potentially affected species has been proposed for Federal listing, or a critical habitat has been proposed, Section 7(a)(4) of the ESA requires the Federal lead agency to consult with the U.S. Fish and Wildlife Service (FWS) or the National Marine Fisheries Service (NMFS), as appropriate, to ensure that the proposed action does not jeopardize the continued existence of the affected species. Threatened, endangered, candidate and proposed state-listed animal and plant species and their habitats that exist in the affected environment must also be considered. Plant or animal species with special status are also included.

The Fish and Wildlife Conservation Act encourages all Federal departments and agencies to conserve and promote conservation of non-game fish and wildlife and their habitats. Also, proposed actions shall be assessed to ensure that wildlife-aircraft hazards are not created or existing ones exacerbated. This assessment can be performed by the U.S. Department of Agriculture (USDA) Wildlife Services or other qualified wildlife biologist.

The affected environment is the area on the Airport that would be directly disturbed by the proposed construction. The area that would be disturbed is paved land and no sensitive resources are within this area. Therefore, the Proposed Project and No Action Alternative would have no effect on fish, wildlife and plants.

\(^1\) In January 1983, as part of an overall recodification of the DOT Act, Section 4(f) was amended and codified in 49 U.S.C, Section 303. This regulation is commonly known as “Section 4(f).”
6.8 Floodplains
Executive Order 11988 directs Federal agencies to take action to reduce the risk of flood loss, minimize the impact of floods on human safety, health and welfare, and restore and preserve the natural and beneficial values served by floodplains. Order DOT 5650.2 contains DOT policies and procedures for implementing the executive order. Agencies are required to make a finding that there is no practical alternative before taking action that would have a significant encroachment upon a base floodplain based on a 100-year flood. In terms of NEPA, a significant encroachment would occur when the proposed action would have notable adverse impacts on the natural and beneficial values of the floodplain.

Floodplains are defined as that portion of lowland and flat area adjoining waters that are subject to a one percent or greater chance of flooding in any given year, i.e., a 100-year flood event. BJI is not located in a 100-year floodplain. Therefore, there would be no impact on 100-year floodplains from the Proposed Project and No Action Alternative.

6.9 Hazardous Materials, Pollution Prevention and Solid Waste
Four primary laws have been passed governing the handling and disposal of hazardous materials, chemicals, substances and wastes. The two statutes of most importance to the FAA in proposing actions to construct and operate facilities and navigational aids are the Resource Conservation and Recovery Act (RCRA), as amended, and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended. RCRA governs the generation, treatment, storage and disposal of hazardous wastes. CERCLA provides for consultation with natural resources trustees and cleanup of any release of a hazardous substance (excluding petroleum) into the environment. Agencies should include an appropriate level of review regarding the hazardous nature of any materials or wastes to be used, generated or disturbed by the proposed action, as well as the control measures to be taken.

In 2006 and 2007 HNTB completed a Phase I Environmental Site Assessment for airport renovation and property acquisition activities. There is one abandoned underground storage tank (UST) near the existing passenger terminal building shown in Figure 2 that would be removed by the Proposed Project. This tank had an in situ site abandonment that is in compliance with state and local requirements. Soil borings were taken and tested when the UST was abandoned and no hazardous substance was present. Soil borings will again be taken and tested prior to removal. The Proposed Project and No Action Alternative are not expected to use, generate or disturb hazardous wastes or hazardous substances.

6.10 Historical, Architectural, Archaeological and Cultural Resources
Historical, architectural, archaeological and cultural resources that would be affected by federally funded/licensed undertakings come under the protection of the National Historic Preservation Act of 1966 (16 U.S.C.470), as amended. This act, in Section 106, requires federal agencies to consider the effects of such undertakings on properties listed, or eligible for listing, in the National Register of Historic Places (NRHP). Regulations related to this process are described in 36 CFR Part 800: Protection of Historic Properties.
The area of potential effect (APE) is the geographic area or areas within which an undertaking may cause changes in the character or use of archaeological sites or historic properties. In general, a structure must be at least 50 years old when the project is completed to be considered for historical or architectural value. A potential effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling or association. Examples of adverse effects include physical damage or alteration of the property, change of the character of the property’s use or of physical features within its setting that contribute to its historical significance, and introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features.

The Proposed Project will not introduce atmospheric or audible elements when compared to the No Action Alternative since the Proposed Project would not change airport operations and therefore noise and air emissions would not change. Therefore, the APE is the area that will be physically disturbed and the surrounding area with structures that will be visible from the Proposed Project. The APE is shown on Figure 4. Three structures within the APE will be physically disturbed – the terminal built in 1991, the Fixed Base Operator (FBO) building #2 built in 1993, and the Air Rescue and Fire Fighters (ARFF) building built in 1974. As shown on Figure 2, the terminal will be demolished in part, an addition to the ARFF building will be constructed and the terminal will be connected to FBO building #2. Each building is significantly less than 50 years old.

The other buildings in the APE shown on Figure 4 are within view of the proposed expansion of the terminal, of which four are over 50 years old – the Quonset hangar structure, the Fixed Base Operator (FBO) building #1, the arched maintenance structure originally built as a hangar and the CAP structure built to house the Civil Air Patrol. The Proposed Project will not introduce visual elements that are not in character with these properties or that would diminish the integrity of their setting since they were built to support airport operations.

Archaeological Research Services (ARS) conducted a Phase I cultural resource investigation of the entire airport property in 2005. The investigation found that the Proposed Project and No Action Alternative would not affect any archaeological or cultural resource. The report is available for review upon request (contact Harold M. Van Leeuwen Jr., Manager, BJI at 218-444-2438).

The Proposed Project and No Action Alternative will not affect any historical, architectural, archaeological, or cultural resource. Therefore, the FAA has found that a No Adverse Effect finding is appropriate for the Proposed Project. The Section 106 Finding and SHPO concurrence are included in Appendix A.

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2 Report on Phase I Cultural Resource Investigation Conducted within Areas Affected by Proposed Improvements at the Bemidji Regional Airport, City of Bemidji/ Eckles Township, Beltrami County, Minnesota, December 2005.
6.11 Light Emissions and Visual Impacts
The potential effect of airport light emissions is based on their visibility from residential property and the type, direction and intensity of the emissions. The affected environment is the area that the airport lighting from the Proposed Project would be visible to residents.

Visual, or aesthetic, impacts deal more broadly with the extent that the development contrasts with the existing environment and whether this contrast is considered objectionable. The Proposed Project and No Action Alternative would not have an adverse visual impact on residents.

6.12 Natural Resources and Energy Supply
The proposed action is to be examined to identify any proposed major changes in stationary facilities or the movement of aircraft and ground vehicles that would have a measurable effect on local supplies of energy or natural resources. The Proposed Project and No Action Alternative would have no effect on local supplies of energy or natural resources.

6.13 Noise
The analysis of noise considers the effects of aircraft noise on residential population and noise-sensitive activities at other places (schools, hospitals, nursing homes, churches, auditoriums and outdoor amphitheaters and concert halls).

For aviation noise analysis, the FAA has determined that the cumulative noise energy exposure of individuals resulting from aviation activities must be established in terms of annual average day/night sound level (DNL) as FAA's primary noise metric. According to FAA land use compatibility guidelines, DNL 65 dBA represents the threshold of significant impact for noise-sensitive land uses.

The Federal Interagency Committee on Noise (FICON) recommends that if noise-sensitive areas would be at or above DNL 65 dBA and would have an increase of DNL 1.5 dBA or more, further analysis should be conducted and mitigation options considered for noise-sensitive areas between DNL 60-65 dBA having an increase of DNL 3 dBA or more due to the proposed action.

The Proposed Project will not change the number of existing and forecasted aircraft operations on the airfield and therefore will not affect aircraft noise. The noise contours for the Proposed Project and No Action Alternative are the same as those shown on Figure 6 of the Runway Safety Improvement and Runway Shift & Extension Project Final Environmental Assessment (attached on following page) approved by FAA on May 24, 2006. The DNL 65 contour lies entirely on airport property. No noise-sensitive land use is in the DNL 65 contour and no noise-sensitive uses in the DNL 60 contour would have an increase of DNL 3 dBA or more; therefore, the Proposed Project and No Action Alternative would not have a noise impact.

6.14 Secondary (Induced) Impacts
Induced or secondary impacts include any shifts in patterns of population movement and growth, the demand for public services, and changes in business and economic activity to the extent influenced by the proposed airport development.
The affected environment is the City of Bemidji and surrounding communities.

The development pattern in the City and surrounding communities in general and around the airport in particular, would not change as a result of implementing the Proposed Project or from the No Action Alternative. Population movement and the growth and demand for public services would not change beyond those patterns and levels currently experienced in the City and surrounding communities. Therefore, there would be no induced or secondary impacts from the Proposed Project and the No Action Alternative.

6.15 Socioeconomic Impacts, Environmental Justice and Children’s Environmental Health and Safety Risks

Socioeconomic Impacts
Socioeconomic impacts include the displacement of persons and businesses as a result of the acquisition of real property, disruption of local traffic patterns that substantially reduce the levels of service of the roads serving the airport and surrounding communities, and a substantial loss in community tax base.

Neither the No Action Alternative nor implementation of the Proposed Project would result in any of the above socioeconomic impacts.

Environmental Justice
The U.S. Department of Transportation (DOT) issued DOT Order 5610.2, Environmental Justice (EJ) in Low-Income Populations and Minority Populations (62 FR 18377, April 15, 1997) to implement in part Executive Order (E.O.) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations (59 FR 7629, February 16, 1994) and the accompanying Presidential Memorandum, and the DOT Strategy (60 FR 33896, June 29, 1995). EJ is concerned with whether or not adverse impacts to the environment and public health of minority populations and low-income populations of Federal actions are disproportionate. E.O. 12898 requires an examination of whether these impacts are disproportionately high and adverse, and evaluation of measures to avoid or minimize the identified disproportionately high and adverse impacts.

The purpose of an EJ analysis is to determine if adverse effects (should there be any) of the proposed action are borne disproportionately by low-income or minority populations. All of the environmental impact categories were reviewed and evaluated to determine whether there would be any disproportionate impacts to minority and low-income populations. It was determined that there would be no adverse effects on low-income or minority populations from the Proposed Project and the No Action Alternative because there are no low-income or minority populations in the affected environments of the impact categories.

Children’s Environmental Health and Safety Risks
The purpose of this impact category is to determine whether or not adverse impacts to the health and safety risks of children as a result of the Federal action are disproportionate. The Proposed Project would not affect the health and safety risks of children because there are no children in the affected environments of the impact categories. Therefore, there would be no adverse effects...
to the health and safety risks of children from the Proposed Project and the No Action Alternative.

6.16 Water Quality
The Federal Water Pollution Control Act (commonly referred to as the Clean Water Act) provides for the establishment of water quality standards, control of discharges, development of waste treatment management plans and practices, prevention or minimization of the loss of wetlands, the location with regard to an aquifer or sensitive ecological area such as a wetlands area, and the regulation of other issues concerning water quality. The purpose of this section is to determine if the proposed action has the potential to exceed water quality standards from the discharge of surface water runoff or the impact to the groundwater and water supply/drinking water sources, or affect waste treatment management plans and practices.

Storm water runoff on the airfield is collected in the existing shallow permeable grassy depressions alongside the runways and taxiways. The runoff is taken up by vegetative growth, percolates into the coarse, sandy soil or simply evaporates. There is approximately 23 acres of impervious surface on BJI. The Proposed Project would add approximately 0.35 acres of impervious surface and would not adversely impact storm water runoff.

There are five active City drinking water supply wells (shown on Figure 3) and two abandoned City wells on the airport. There is one active tenant well, one US Geological Survey (USGS) monitoring well, two airport monitoring wells, and one abandoned airport well. All wells comport with the City’s well head protection plan. The Proposed Project and No Action Alternative would not impact the wells on the airport.

The Proposed Project and No Action Alternative would not affect the deicing of aircraft, which is performed by Mesaba Airlines on a parking ramp north of the main terminal. Other aircraft are deiced inside warm hangars. An in-ground glycol containment system was installed at BJI in August 2006 to capture and dispose of glycol associated with de-icing activities.

Potential pollutant sources at BJI are identified in the Spill Prevention Control and Countermeasure Plan (SPCCP) and Storm Water Pollution Prevention Plan (SWPPP) that have been prepared and implemented for BJI. Each BJI tenant that is required to prepare and update their SPCCP has done so. The SPCCP at BJI is current. These plans outline operating procedures for material handling activities, spill containment, cleanup, and describe control and best management practices to minimize pollutants in storm water runoff. Copies of these plans are available for review upon request. The Proposed Project would require the issuance of a Phase II NPDES construction permit from the MPCA.

The Proposed Project and No Action Alternative would not affect the existing conditions regarding groundwater and water supply/drinking water sources, or affect waste treatment management plans and practices. In summary, the Proposed Project and No Action Alternative would not have the potential to exceed water quality standards.

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3 Copies of the SPCCP and SWPPP are available upon request. Contact Harold M. Van Leeuwen, Jr.; Phone 218/444-2438

Final Environmental Assessment – Terminal Rehabilitation, Modernization and Energy Improvement Project
6.17 Wetlands
E.O. 11990, Order DOT 5660.1A, the Rivers and Harbors Act of 1899 and the Clean Water Act address activities in wetlands. As shown in Figure 3, there are no wetlands in the affected environment, which is shown as the APE in Figure 4. Therefore, the Proposed Project and No Action Alternative would not impact a wetland.

6.18 Wild and Scenic Rivers
The Wild and Scenic Rivers Act, as amended, describes those river segments designated or eligible to be included in the Wild and Scenic Rivers System. River segments eligible for protection are those that are free flowing and have “outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural and other similar values.” River segments that appear to qualify for inclusion in the National Wild and Scenic River System are listed on the Nationwide Rivers Inventory (NRI), compiled by the National Park Service of the U.S. Department of Interior.

No wild and scenic river or NRI river segment is in the affected environment; therefore, the Proposed Project and No Action Alternative would have no impact.

6.19 Cumulative Effects
A cumulative effect on the environment results from the incremental effect of a proposed action/alternative when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions. The CEQ Handbook “Considering Cumulative Effects” (January 1997) recommends that a list of potential effects and issues be established during the scoping process; that a geographic boundary and timeframe be established, that a list of other actions contributing to cumulative effects be identified, and that information related to the affected environment and environmental consequences be obtained. This information should include thresholds, standards, guidelines and planning goals.

There are no known off-airport projects or actions that would have a cumulative effect with the environmental consequences of the Proposed Project. Planned development on the Airport is shown on Figure 5, which includes expansion of the parking lot, potential GA hangar development north of Runway 13/31 and associated Taxiway D, airport business development on the north and west sides of the Airport and a new access road. The parking lot expansion would create approximately 2.64 acres of impervious surface, which results in a total of 2.99 acres when combined with the 0.35 acres from the Proposed Project. This cumulative effect would not require a modification of the SWPPP. If the other developments are implemented, additional cumulative storm water runoff would result, which may require a modification of the SWPPP.

7.0 Public and Agency Coordination
A public notice was published in the local newspaper on January 29, 2009 and placed on the City of Bemidji website informing the public that the City was in the process of preparing an EA for the proposed expansion and modernization of the terminal and to contact the airport manager if
there were questions or comments. The Draft EA was distributed by March 9, 2009. A public notice was published in the local newspaper on February 6, 2009 and placed on the City of Bemidji website informing the public of the availability of the Draft EA and the end of the comment period on March 11, 2009. Three comment letters were received – from the EPA, Mn/DOT Aeronautics and the Minnesota SHPO. These comments and responses are provided in Appendix A.

8.0 List of Preparers
The following individuals assisted in the preparation of this document.

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<thead>
<tr>
<th>Preparer</th>
<th>Title/Firm</th>
<th>Education/Registration</th>
<th>Years Exp.</th>
<th>EA Responsibility</th>
</tr>
</thead>
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<td>36</td>
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<td>3</td>
<td>Graphics</td>
</tr>
</tbody>
</table>
9.0 List of Agencies, Jurisdictions, Private Parties and Depositories That Received the Draft EA

FEDERAL
U.S. Army Corps of Engineers, St. Paul Office
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service, Twin Cities Field Office
U.S. Department of Agriculture Wildlife Services
National Park Service, Stewardship Team Manager, St. Paul, MN

STATE
Department of Agriculture
Department of Commerce
Department of Health
Department of Natural Resources
Department of Transportation
Historical Society, State Preservation Officer
Pollution Control Agency
Board of Water and Soil Resources

LOCAL
City of Bemidji
Beltrami County
Appendix A

Comments on Draft EA and Responses

Comments were received from the following:

U.S. Environmental Protection Agency (EPA)
Minnesota Department of Transportation (Mn/DOT)
Minnesota Historical Society SHPO
Dan Millenacker  
Federal Aviation Administration - Minneapolis Airports District Office  
Minneapolis-St. Paul International Airport  
6020 28th Avenue South, Room 102  
Minneapolis, MN 55450-2706  


Dear Mr. Millenacker:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the above referenced Draft Environmental Assessment (DEA).

The DEA identifies the following components of the proposed project:

- Expansion of the existing terminal from 13,064 to 28,738 sq. ft. to provide space for one additional gate (for a total of two gates), ticketing, security screening and baggage handling;
- Provision of two jet boarding bridges;
- Replacement of majority of the mechanical system to comply with current energy codes;
- Replacement of lighting and other electrical components with new energy efficient system;
- Removal of existing Civil Air Patrol (CAP) building to provide space for the parking lot expansion (CAP activities will be moved to the existing building used by the Bemidji Gun Club, which will relocate off airport);
- Removal of existing 327 parking spaces and construction of a reconfigured parking area with 436 parking spaces;
- Modification of the entry road serving the terminal and parking areas.

Based on our review of the DEA, your NEPA document will need to address a number of concerns, including hazardous materials, potential impacts to water resources, and secondary and cumulative impacts. We recommend the document identify specific demolition/construction mitigation measures that will be undertaken, notably to determine if asbestos, contaminated soils and lead paint are present, and if so, to describe how those materials will be managed to comply with Federal and state requirements. In addition, we recommend the project proponents consider using green building strategies. Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building’s life cycle from siting to design, construction, operation, maintenance, renovation and deconstruction. Our detailed comments are enclosed.
Thank you for the opportunity to comment on the DEA. We look forward to reviewing the future NEPA document for this proposal. If you have any questions, please contact Ms. Laszewski at (312) 886-7501.

Sincerely,

[Signature]

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance

Enclosure

cc: Harold Van Leeuwen, Jr., Manager, Bemidji Regional Airport, 3824 Moberg Drive NW, Suite 101, Bemidji, MN 56601
EPA Comments regarding
Draft Environmental Assessment for Terminal Rehabilitation,
Modernization and Energy Improvement Project
Bemidji Regional Airport
Bemidji, Minnesota

WETLANDS AND WATER QUALITY
Wetlands: Based on the information in the DEA, we understand that there will be no direct wetland impacts from the proposed project (page 12). However, the DEA does not provide a figure that discloses the locations of the wetlands located on and next to the airport property to substantiate this claim.

EPA recommends the EA include a map and figure that depict the location and types of wetlands on and near the airport property in relation to existing, currently proposed and future airport facilities as depicted in Figure 5 - Long Term Airport Plan.

Surface and Ground Water Quality: The DEA is unclear how many active drinking water supply wells are located on or near the airport property (page 12). We recommend the NEPA document accurately identify all wells on or near airport property that have been or are currently being used as drinking water supply wells.

In addition, the DEA is also unclear whether or not the airport owners installed the in-ground glycol containment system identified in FAA’s 2006 Final EA for the Bemidji Runway Shift and Extension Project (page 12). If the system has not been installed, we recommend the NEPA document explain why it has not been installed. The NEPA document should also identify when it will be installed.

HAZARDOUS MATERIALS
Wastes generated as a result of aircraft maintenance activities can include organic solvents, oil and grease, tires, and batteries. Some of these wastes can be toxic or otherwise hazardous. Uncontrolled releases can contaminate surface waters, groundwater, and soils.

EPA recommends the NEPA document identify the type of maintenance, painting and/or washing activities that occur at the existing airport. Please describe whether or not current facilities at the airport: 1) use recycled-content maintenance products when possible, 2) collect engine and hydraulic oil for recycling, and 3) reuse or recycle spent antifreeze. We also recommend that the NEPA document include the Spill Prevention and Countermeasure Plan (SPCCP) and Storm Water Pollution Prevention Plan (SWPPP) (page 12).

Gun Club on Airport Property and Proposed Relocation: But for the new proposed facilities at the airport, the Gun Club would remain on the airport property. Consequently, the secondary and cumulative impacts associated with the new Gun Club facility should be identified.

We recommend the future NEPA document include information to answer the following questions:

- Where is the Bemidji Gun Club building located on the airport property?
- Does the club run a skeet shooting operation on and/or next to the airport property? Where?
- How long has this Gun Club operated the skeet shooting operation?
- Are any of the soils on or next to the airport property contaminated with lead and/or other
hazardous substances known to be associated with lead shot and/or certain types of clay pigeons used now or in the past during skeet shooting?

- Are any of the drinking water supply wells on the airport property potentially at risk of contamination from any potential hazardous material associated with the Gun Club’s skeet shooting operations?
- When was the last time drinking water wells located on and near the airport property were tested? What are the results of the latest tests?
- Where will the Gun Club relocate to?
- What are the potential environment impacts and human health risks associated with the proposed operation of the Gun Club at the new location?

**Underground Storage Tank (UST):** We recommend the NEPA document identify whether or not the area around the UST is contaminated and if the area would be disturbed during project construction. If applicable, please identify the precautions that will be taken to make sure any contaminated soil will be properly handled and disposed of.

**Lead Paint and Asbestos - Existing Buildings:** The NEPA document should identify the age of the existing buildings and whether they will be demolished in-whole or in-part. The NEPA Document should identify whether or not the buildings have been tested for lead paint and asbestos. Please identify the specific precautions/methods, if applicable, that will be taken during demolition/remodeling.

**EA FIGURES**

We recommend the EA provide figure/s with current air photos of the airport property and study area that identify the location of:

- all existing buildings, their owners and uses;
- the UST;
- all wetlands and wetland types; and,
- the existing Gun Club and associated shooting range.

In addition, we recommend the EA provide the following:

- a figure using current air photos that depict the proposed new location or locations under consideration for the Gun Club’s new location off airport property; and
- a figure that identifies the airport’s noise contours, such as Figure 6 in FAA’s 2006 EA.

**GREEN BUILDING**

**New Buildings and Parking Expansion:** Other than identifying the proposed footprint of the proposed terminal and parking expansion area, the EA does not provide more detailed information on the design of the building and the materials that will be used. The EA would be improved by answering the following questions:

- Is the new building already designed?
- What is the proposed new building to be made of?
- Will recycled-content materials be used in construction?
- How will the building be heated, insulated and lighted?
- Will solar panels be used?
- Is the new building designed to be more energy efficient than the existing building?
- Would the new building use less energy than is currently being used?
- Have permeable pavements been considered for incorporation into the project?

We recommend the project proponents consider using green building strategies. Green building is the practice of creating structures and using processes that are environmentally responsible and
resource-efficient throughout a building's life cycle from siting to design, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. By adopting green building strategies, you can maximize both economic and environmental performance. Green construction methods can be integrated into buildings at any stage, from design and construction, to renovation and deconstruction. Potential benefits of green building can include:

- **Environmental benefits**: enhanced and protect biodiversity and ecosystems, improve air and water quality, reduce waste streams;
- **Economic benefits**: reduce operating costs; improve occupant productivity; and,
- **Social benefits**: enhance occupant comfort and health, minimize strain on local infrastructure.

For additional information regarding green building, we recommend you visit our website [www.epa.gov/greenbuilding](http://www.epa.gov/greenbuilding). The future EA would be enhanced by identifying the green building strategies adopted for this current proposal by the project proponents.

**CONSTRUCTION IMPACTS**

EPA recommends the specific measures (best management practices) that can be undertaken to minimize construction impacts to air quality as well as water resources, soils and other regulated resources be identified in the NEPA document.

We recommend the NEPA document identify opportunities for the project proponents to use clean diesel equipment, vehicles and fuels in construction of the project. We recommend the project proponents consider implementing one or more of the following measures when feasible:

- **Reduce emissions of diesel particulate matter (DPM) and other air pollutants by using particle traps and other technological or operational methods. Control technologies, such as traps, control approximately 80 percent of DPM. Specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions.**
- **Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.**
- **Prohibit engine tampering to increase horsepower.**
- **Locate diesel engines, motors, and equipment as far as possible from residential areas and sensitive receptors (e.g., schools, daycare centers, and hospitals).**
- **Require low sulfur diesel fuel (<15 parts per million), if available.**
- **Reduce construction-related trips of workers and equipment, including trucks.**
- **Lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower.**
- **Use engine types such as electric, liquefied gas, hydrogen fuel cells, and/or alternative diesel formulations, if feasible.**
Ms. Krull-

This email responds to your May 21, 2009, letter w/above referenced Final EA, for my review and comment, prior to FAA issuing a Finding of No Significant Impact.

The current proposal no longer includes the parking lot expansion due to funding issues. Consequently, the gun club proposes to remain on airport property. I reviewed the sponsor’s responses (Appendix A) provided to FAA in response to EPA’s March 3, 2009, comment letter regarding the Draft EA. The majority of EPA’s comments were adequately responded to. Please note that the applicant does not answer our comment/questions regarding skeet shooting and lead shot (comment/response #6), nor identify specific best management practices (comment/response #11).

Thank you for the opportunity to review and comment on FAA’s unsigned Final EA.

Virginia Laszewski
Environmental Scientist

US EPA, Region 5
NEPA Implementation, OECA
77 W. Jackson Blvd. (mail code: E-19J)
Chicago, IL  60604-3590
Phone:  (312) 886-7501
Fax:  (312) 697-2097
email: laszewski.virginia@epa.gov

Note: Responses #6 and #11 in the following responses to EPA comments were revised based on this e-mail.
Responses to EPA Comments

1. See attached responses to detailed comments.

2. Wetlands are provided on revised Figure 3.

3. Drinking supply wells are shown on revised Figure 3.

4. The glycol containment system was installed in August 2006.

5. The proposed project/terminal expansion will not affect maintenance activities, which are performed inside the hangars. Used fluids are collected by a licensed waste hauler for recycling and/or disposal. Spent antifreeze is not recycled. As noted on page 14 of this EA, copies of the SPCCP and SWPPP are available upon request.

6. As stated on page 1 of this Final EA, the parking lot expansion has been removed from the proposed project. The Gun Club is shown on Figure 3 and has been in operation since 1967. Use of the Gun Club includes skeet shooting, which results in the deposit of lead shot on airport property. The Gun Club is responsible for the reclamation of this lead shot, which will be performed within the next couple of years. The drinking water supply wells are tested twice per month and were last tested in April 2009 and no lead contamination was found.

7. Soil borings were taken and tested when the UST was abandoned and no hazardous substance was present. Soil borings will again be taken and tested prior to removal.

8. There are three structures in the APE that will be physically affected – the terminal built in 1991. Fixed Base Operator (FBO) building #2 built in 1993, and Air Rescue and Fire Fighters (ARFF) building built in 1974. As shown on Figure 2, the terminal will be demolished in part, an addition to the ARFF building will be constructed and the terminal will be connected to the FBO building. These buildings have been inspected and none contain lead paint or asbestos. The APE and the three buildings are shown on Figure 4.

9. The figures have been revised to show the existing buildings, the UST wetlands and gun club. The noise contours have been added to the noise section.

10. The new building has not been designed; it will be made of masonry, steel and glass. It is unknown if recycled-content materials will be used. The terminal will use geothermal heat; solar panels will not be used. The new terminal will be more energy-efficient and therefore use less energy than the existing terminal.

11. Cost-effective BMPs consistent with all applicable federal, state, and local regulatory requirements will be employed to minimize construction impacts.

12. Comment noted. One or more of the listed actions will be considered and implemented if feasible.
The Draft Environmental Assessment for Terminal Rehabilitation, Modernization and Energy Improvement Project at the Bemidji Regional Airport has been received and reviewed by staff at the Office of Aeronautics. Please consider the following comments.

3.0 Purpose and Need
Restate the forecasted activity levels that justified the project need in the Bemidji Regional Airport Master Plan so that readers who do not have access to the master plan have the forecast information.

The last paragraph states, "there is an immediate need for all types of parking in the terminal area." What is the basis for this argument? Why is there an immediate need? How many stalls are needed in the short term? How many in the long term? How many rental stalls?

5.1 General Setting
In response to the increasing traffic volume, how will development pressure be controlled so the airport is not adversely impacted? Please address this in Section 6.3 Compatible Land Use or 6.14 Secondary Impacts.

5.2 Future Actions
Replace the word "airport" with "aircraft" to: Current airport plans call for the construction of new individual "aircraft" hangars...

6.9 Hazardous Materials, Pollution Prevention and Solid Waste Will the abandoned underground storage tank be removed and soil disturbed by the terminal building expansion? If so, how will soil and tank removal be handled and monitored?

6.11 Is there any increased lighting with parking and building expansion?

6.16 Water Quality
In response to "the proposed project would not add impervious surface and therefore would not impact storm water runoff"; it appears that areas currently covered by grass will be replaced with roofs or pavement when the building is expanded. The parking areas are also being increased. Will this increase in impervious area require mitigation or management? If so, how will it be addressed?

Thank you for the opportunity to provide comments. Please feel free to contact me if you have any questions.
Responses to Mn/DOT Comments

1. The forecasts are presented in Table 2 of this Final EA.

2. As stated on page 1 of this Final EA, the parking lot expansion has been removed from the proposed project.

3. Increasing traffic volume will not result in increased development pressure outside the airport. Land use zoning in Mn/DOT safety zones is in process to prevent development incompatible with airport operations.

4. The replacement has been made.

5. The UST will be removed. Soil borings were taken and tested when the UST was abandoned and no hazardous substance was present. Soil borings will again be taken and tested prior to removal.

6. Any increased terminal lighting will be minimal and not adversely affect residential property.

7. This section has been revised; a small amount (0.35 acres) of pervious surface will be removed. The project will be designed such that the existing discharge rate will not increase due to the additional runoff.
Minnesota Historical Society

State Historic Preservation Office

March 10, 2009

Ms. Kandice Kruij
Environmental Protection Specialist
Federal Aviation Administration
Minneapolis Airports District Office
MSP-ADO-600
6020 28th Avenue South, Room 102
Minneapolis, MN 55450

Re: Draft EA – Terminal Rehabilitation, Modernization and Energy Improvement Project
Bemidji Regional Airport
Bemidji, Beltrami County
SHPO Number: 2009-1069

Dear Ms. Kruij:

Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

We have received information about this project from Harold Van Leeuwen of the Bemidji Regional Airport. The Draft Environmental Assessment fails to delineate an area of potential effect for the purposes of the Section 106 review. This APE needs to be defined. Buildings/structures within the area need to be assessed to determine if they are eligible to the National Register.

We note that a 2005 Cultural Resource Investigation recommended further evaluation of two identified buildings at the airport. Other buildings in the APE may need to be addressed as well.

No archaeological investigation of the area included in the scope for this specific project is recommended.

We look forward to working with you to complete this review. Contact us at 651-259-3456 with questions or concerns.

Sincerely,

[Signature]

Dennis A. Gimmeson
Government Programs & Compliance Officer

cc: Harold Van Leeuwen, Bemidji Airport
Responses to SHPO Comments

1. The proposed project has been revised; the parking lot expansion has been removed, as discussed on page 1. The historical section of the EA has also been revised. New Figure 4 shows the APE and structures over 50 years old. Four structures are over 50 years old – the Quonset hangar structure, the Fixed Base Operator (FBO) building #1, the arched maintenance structure originally built as a hangar and the CAP structure built to house the Civil Air Patrol. The Proposed Project will not introduce visual elements that are not in character with these properties or that would diminish the integrity of their setting since they were built to support airport operations.
1. DESCRIPTION OF THE UNDERTAKING

The proposed project at the Bemidji Regional Airport consists of:
- Expansion of the existing terminal building from 13,064 to 28,738 square feet
- Construction of one additional gate (for a total of two gates)
- Provision of two all-weather jet boarding bridges
- Replacement of majority of mechanical system to comply with current energy codes
- Replacement of lighting & other electrical components with energy efficient systems
- Expansion & rehabilitation of existing Air Rescue and Fire Fighting building

2. AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) is the geographic area an undertaking may directly or indirectly affect an historic property, if any such properties are identified. The APE for this project encompasses all potential areas of disturbance and all property within the view-shed (the area that the project may visually affect) (Figure 1).

3. EFFORTS TO IDENTIFY HISTORIC PROPERTIES

Archaeological Research Services (ARS) conducted a Phase I cultural resource investigation of the entire airport property in 2005 (previously submitted to the State Historic Preservation Office (SHPO)). The investigation did not uncover any archaeological or cultural resources within the project area.

In addition, the entire APE has been subject to various earthmoving activities over the years. Disturbance on the site includes excavation, grading, and other earthmoving activities to construct the runways, aprons, and buildings in the area, which did not result in the discovery of any archaeological resources. Therefore, given the previous extent of disturbance and the results of the Phase I investigation, it is highly unlikely that any archaeological resources exist within the APE.

Four structures within the APE may be eligible for listing on the National Register of Historic Places - the Quonset hangar, the arched maintenance structure, the Civil Air Patrol structure, and the Fixed Based Operator (FBO) building #1. The proposed project will not affect these resources. The proposed improvements will not result in any direct or indirect impacts. The project will not change the type of aircraft that currently use the airport, or change the visual setting of the properties.
4. BASIS FOR FINDING

Completion of the previous surveys, literature searches, and coordination did not identify any impacts to any National Register listed or eligible-for-listing resources. If any construction activity results in the inadvertent discovery of a cultural resource, construction will halt until the SHPO and the Federal Aviation Administration (FAA) are notified.

The FAA has therefore determined that a finding of No Historic Properties Affected is appropriate for this project. The FAA respectfully requests that the SHPO provide written concurrence with this Section 106 finding.

ATTACHMENTS

APE
Terminal Rehabilitation, Modernization, and Energy Improvement EA Text

________________________________________
Kandice Krull
Environmental Protection Specialist
Federal Aviation Administration
Minneapolis Airport District Office

________________________________________

Date
May 18, 2009
June 17, 2009

Kandice Krull  
Environmental Protection Specialist  
Federal Aviation Administration  
Minneapolis Airports District Office  
MSP-ADO-600  
6020 28th Avenue South, Room 102  
Minneapolis, MN 55450

RE: Bemidji Regional Airport – Terminal Rehabilitation, Modernization, and Energy Improvement  
Project  
Bemidji, Beltrami County  
SHPO Number: 2009-1069

Dear Ms. Krull:

We last wrote you regarding the above-referenced project on 10 March 2009.

We appreciate your recent submittal on the project. On the basis of our review of that submittal, we concur with your finding that no historic properties will be affected by the above undertaking.

We do note that four buildings at the airport have been identified as needing additional evaluation. These buildings will not be affected by this project, but they should be taken into account and evaluated during the planning of future projects.

Contact us at (651) 259-3455 with questions or concerns.

Sincerely,

Britta L. Bloomberg  
Deputy State Historic Preservation Officer
Appendix B
Figures

Figure 1  Location Map
Figure 2  Proposed Terminal Expansion
Figure 3  Existing Airport
Figure 4  Area of Potential Effect (APE)
Figure 5  Long-Term Airport Plan
Environmental Assessment

Area of Potential Effect (APE)

Figure 4