Short Form Environmental Assessment

FEDERAL AVIATION ADMINISTRATION
MEMPHIS AIRPORTS DISTRICT OFFICE

CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT
CHARLOTTE, NORTH CAROLINA

Airport Name: Charlotte-Douglas International Airport

Proposed Project: Shopton Road Land Release EA

This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

Jim Alexander
Responsible FAA Official

09/24/19
Date

ENVIRONMENTAL EVALUATION (Short Form Environmental Assessment) for AIRPORT DEVELOPMENT PROJECTS

~ Aviation in Harmony with the Environment ~

FEDERAL AVIATION ADMINISTRATION
MEMPHIS AIRPORTS DISTRICT OFFICE–SOUTHERN REGION
AIRPORTS DIVISION

Airport Name: **Charlotte Douglas International Airport**

Airport Location: **Charlotte, North Carolina**

Proposed Project: **Release of Airport Property along Shopton Road**

Date: __9/5/19_____

FAA MEM-ADO, SOUTHERN REGIONAIRPORTS DIVISION
ENVIRONMENTAL EVALUATION FORM
FOR SHORT ENVIRONMENTAL ASSESSMENTS

The Short Form Environmental Assessment (EA), is based upon the guidance in Federal Aviation Administration (FAA) Order 5050.4B, "National Environmental Policy Act, Implementing Instructions for Airport Projects" or subsequent revisions, which incorporates the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (NEPA), as well as the US Department of Transportation environmental regulations (including FAA Order 1050.1E or subsequent revisions), and many other federal statutes and regulations designed to protect the Nation's natural, historic, cultural, and archeological resources. This version of the short form EA should be used only for projects at federally obligated airports that fall within the boundaries of the Memphis Airports District Office (MEM-ADO).

The Short Form EA is intended to be used when a project cannot be categorically excluded (CATEX) from formal environmental assessment, but when the environmental impacts of the proposed project are expected to be insignificant and a detailed EA would not be appropriate. Accordingly, this form is intended to meet the intent of a short EA while satisfying the regulatory requirements of an EA.

Proper completion of the Short Form EA would allow the FAA to determine whether the proposed airport development project can be processed with a short EA, or whether a more detailed EA must be prepared. The MEM-ADO normally intends to use a properly completed Short Form EA to support a Finding of No Significant Impact (FONSI).

Applicability

The Short Form EA should be used if the sponsor's proposed project meets the following two (2) criteria:

1) The proposed project is a normally categorically excluded action that may include extraordinary circumstances Table 6-3; paragraph 702.a. or the airport action is one that normally requires an EA but involvement with, or impacts to, the extraordinary circumstances are not notable in number or degree of impact, and that any significant impacts can be mitigated below the level of significance, 5050.4B, Table 7.1.

2) The proposed project must fall under one of the following categories of Federal Airports Program actions noted with an asterisk (*):

(a) Approval of an airport location (new airport).
*(b) Approval of a project on an airport layout plan (ALP).
*(c) Approval of federal funding for airport development.
*(d) Requests for conveyance of government land.
*(e) Approval of release of airport land.
*(f) Approval of the use of passenger facility charges (PFC).
*(g) Approval of development or construction on a federally obligated airport.

Do any of these listed Federal Airports program action(s), 2(b) - (g), apply to your project?
Yes __✓___ No** _____ If "yes," list them here (there can be more than one).

The Proposed Project falls under categories 2(b) and 2(e).

If "no," see (**) below.

**** If the proposed project does not meet 1) or 2) above, i.e., one or more answers to the questions resulted in a (**), do not complete this Form. Rather, contact the Environmental Protection Specialist at the Memphis Airports District Office for additional guidance.**

Instructions
Prior to preparing any NEPA documentation, including the Short Form EA, the MEM-ADO encourages you to contact the Environmental Protection Specialist or Program Manager to ensure that the Short Form EA is the proper Form for your proposed action. Completed forms without prior MEM-ADO concurrence may result in approval delays or rejected NEPA documentation.

To complete the Form, the preparer should describe the proposed project and provide information on any potential impacts of the proposed project. Accordingly, it will be necessary for the preparer to have knowledge of the environmental features of the airport. In addition, while the preparer should have knowledge of the airport and associated features, correspondence with federal, state, and local regulatory agencies should be completed, when appropriate, to ensure that protected environmental resources are identified in the study area. In cases where regulatory agency coordination is appropriate, the preparer should submit a project description and drawing to the Environmental Protection Specialist for concurrence prior to submitting the project proposal to outside agencies.

Correspondence from federal, state, and local agencies, project plans or maps, or secondary environmental studies, should be included as an appendix to this form.

It is important to note that in addition to fulfilling the requirements of NEPA through this evaluation process, the FAA is responsible for ensuring that airport development projects comply with the many laws and orders administered by the agencies protecting environmental resources. The Form is not meant to be a stand-alone document. Rather, it is intended to be used in conjunction with applicable Orders, laws, and guidance documents, and in consultation with the appropriate resource agencies.

Complete the following information:
1. Project Location:
Airport Name: Charlotte Douglas International Airport
Airport Address: 5501 Josh Birmingham Parkway
City: Charlotte County: Mecklenburg State: North Carolina

2. Airport Sponsor Information:
Point of Contact: Amber Leathers, C.M., ACE – Senior Airport Planning Coordinator
Address: 5601 Wilkinson Boulevard, Charlotte, North Carolina 28208
Telephone: (704) 560-1820 Fax: N/A
E-mail: alleathers@cltairport.com

3. Evaluation Form Preparer Information:
Point of Contact: David Alberts, Project Manager – RS&H, Inc.
Address: 10748 Deerwood Park Boulevard South, Jacksonville, Florida, 32256
Telephone: (904) 256-2469 Fax: (800) 464-4358
E-mail: david.alberts@rsandh.com

4. Proposed Development Action (describe **ALL** associated projects that are involved):

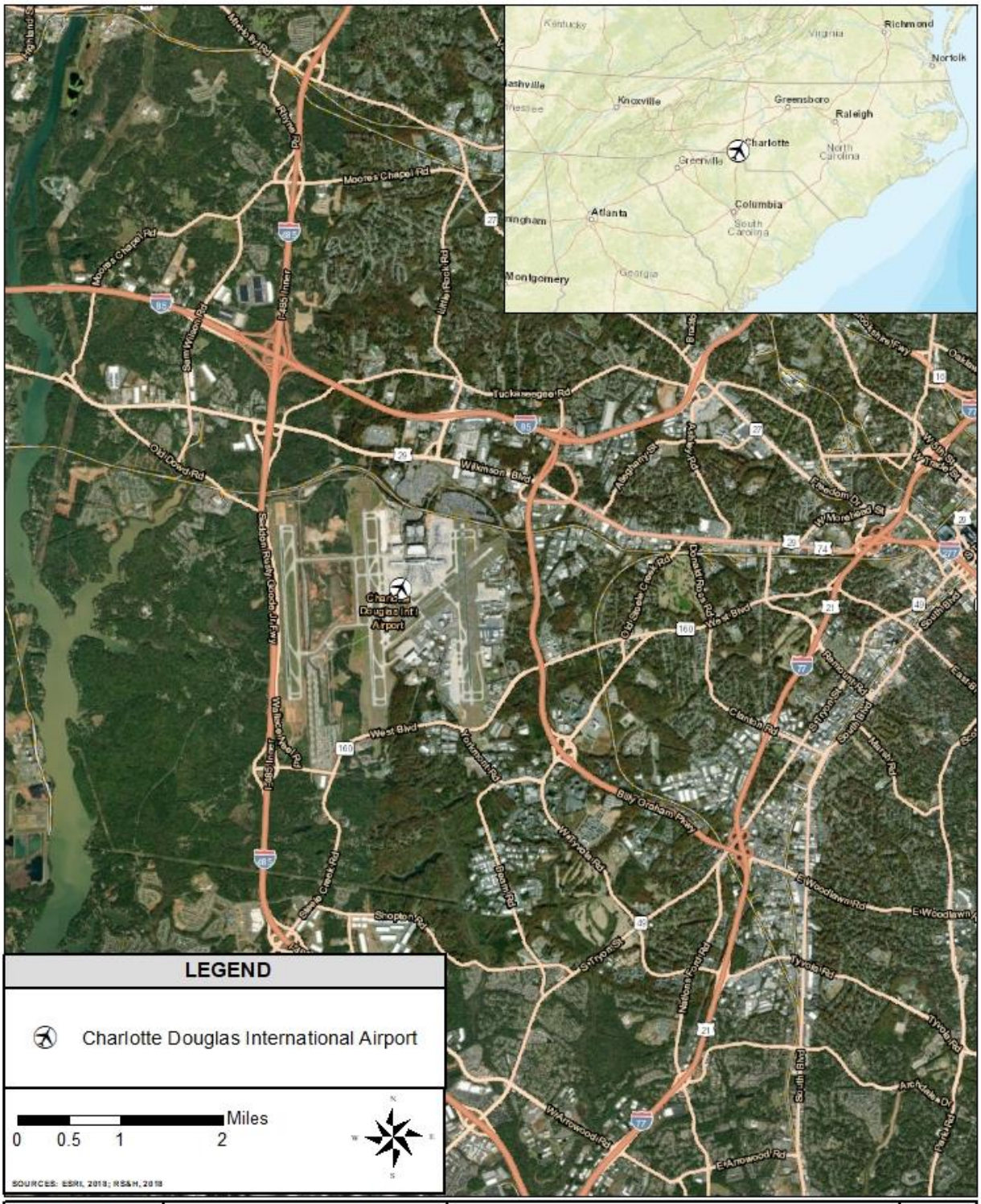
The City of Charlotte (City) owns and operates the Charlotte Douglas International Airport (Airport). The Airport is located on about 6,000 acres of land in the City of Charlotte, in west Mecklenburg County, North Carolina (see **Exhibit 1**). The City proposes to release the Airport-owned parcels shown in **Exhibit 2** from federal obligations incurred when the City accepted an Airport Improvement Grant to acquire the parcels. The City proposes to sell these parcels to a potential new owner/developer(s) for future non-aviation development. Each land sale transaction would include FAA approved avigation easements. This release of Airport property with the associated avigation easements comprises the Proposed Project. Development of this area would be consistent with the existing light industrial zoning[1], which permits a broad range of retail commercial uses, shopping centers, eating establishments, business and professional services, and automotive services.[2]

Exhibit 3 shows a constraints map used for planning purposes. The exhibit shows where development would avoid or minimize environmental effects (e.g., impacts to wetlands, 100-year floodplain, and surface waters). The new owner would comply with all applicable laws and regulations. Development(s) within environmentally sensitive areas involve potentially time consuming and costly permitting processes and mitigation.

Development would be consistent with the existing zoning for the area. This assumption is consistent with FAA guidance in Order 5050.4B, NEPA Implementing Instructions for Airport Actions.

The new owner/developer(s) would need to obtain and comply with federal, state, and local permits including, but not limited to: a land disturbing activity permit (which includes the submittal of an erosion and sediment control plan), building permits, a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, and a wetlands permit under Section 404 of the Clean Water Act for any impacts to Waters of the U.S. These permits include various stipulations such as coordination with federal and state agencies regarding potential environmental effects of the new owner/developer(s) proposed development. The applicable provisions of permits that a new owner/developer(s) would need to obtain are further discussed in the applicable environmental resource categories in Section 8 of this EA.

[1] City of Charlotte. (2018). Zoning, Charlotte, NC. Retrieved December 2018, from Charlotte Planning Maps and Tools: http://charlotte.maps.arcgis.com/apps/webappviewer/index.html?id=ec2c9241a46d4b77ab424c7ca629bde7
[2] City of Charlotte. (2018, March 29). City of Charlotte Zoning Ordinance, Chapter 9 General Districts. Retrieved December 2018, from Zoning Ordinance: https://charlottenc.gov/planning/Rezoning/Pages/Zoning%20Ordinance.aspx



CLT CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT	*Environmental Assessment* ***CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT***	Airport Location	EXHIBIT: 1

CLT CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT	*Environmental Assessment* ***CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT***	Proposed Project Location	EXHIBIT: **2**

CLT CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT	*Environmental Assessment* *CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT*	Developable Land within Project Study Area	EXHIBIT: 3

The City seeks unconditional FAA approval of revisions to the Airport Layout Plan showing the removal of non-aeronautical property south of the Airport along Shopton Road and release of the these parcels from federal obligations incurred when the City accepted an Airport Improvement Grant to acquire the parcels. The Proposed Project evaluated in this EA includes the release of up to 117 acres of Airport property to a new owner/developer(s) for potential non-aviation development in accordance with City of Charlotte zoning for this area.

5. Describe the Purpose of and Need for the Project:

According to FAA Order 1050.1F, Change 1, Section 6.2-1(c), the Purpose and Need briefly describes the underlying purpose and need for the federal action. This section presents the problem being addressed and describes what the City is trying to achieve with the Proposed Project. The Purpose and Need is to further support the City with additional income through the release of Airport-owned parcels, and to provide land use planning that is consistent with applicable FAA and Airport planning objectives.

- » Release Airport assets to provide the City with diversified revenue streams consistent with the City's obligation to enhance the Airport's financial self-sufficiency as specified in Grant Assurance 24.
- » Provide orderly land use planning to ensure potential development is compatible with those operations consistent with the City's obligation to ensure the safe and efficient operation of the Airport.

The City has the opportunity to continue making the Airport as financially self-sustaining as possible by providing additional income to the Airport through the sale of land parcels. In July 2018, the City had a qualified appraiser complete an estimated market value of the Proposed Project's parcels. Based on a site inspection, data collected and analysis, the market value of the land was estimated to be greater than $6.7 million. The sale of these parcels would provide potential economic and fiscal benefits for the Airport.

Land use control measures through the sale of non-aeronautical property to a new owner/ developer(s) would continue the Airport's safe and efficient aviation operations. With each sale, avigation easements for the new owner/developer(s) would assure development is compatible with Airport operations for the continued safe and secure use of the property.

6. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, and include a description of the "No Action" alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why:

Considering a reasonable range of options ensures that alternatives have not been prematurely dismissed from consideration. As required by Council of Environmental Quality (CEQ) Regulations and the National Environmental Policy Act (NEPA), reasonable alternatives includes taking no action (the No Action Alternative).

Identification of Reasonable Alternatives

The City's sale/release of up to 117 acres of non-aeronautical use Airport property, and avigation easements would not directly impact environmental resources subject to special purpose laws (e.g., Executive Order 11988, the Floodplain Management or Executive Order 11990, Protection of Wetlands and DOT Order 5660.1A, Preservation of the Nation's Wetlands).

The City's release of Airport property could result in indirect environmental impacts as a result of development by the new property owner(s)/developer(s) (see **Section 8** of this EA for further details).

FAA Order 1050.1F, Paragraph 6-2.1 states: "An EA may limit the range of alternatives to the proposed action and no action when there are no unresolved conflicts concerning alternative uses of available resources." In the absence of unresolved conflicts, the consideration of other alternatives to avoid or minimize potential impacts to these resources is not warranted.

No Action Alternative. The No Action Alternative does not meet the stated Purpose and Need for the Proposed Project. Under the No Action Alternative, the City would not sell vacant non-aeronautical Airport parcels south of Runway 18L-36R. This alternative would not provide additional revenue for the City. The No Action Alternative would avoid any potential direct and indirect environmental impacts. As noted in the CEQ Memorandum: Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, analysis of the No Action Alternative provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives.

Proposed Project. The Proposed Project is the sale/release of up to 117 acres of non-aeronautical Airport property south of Runway 18L-36R for airport-compatible, non-aeronautical use. With the sale/release of Airport property, an avigation easement(s) for the new owner/developer(s) would assure development is compatible with Airport operations and meets FAA design standards for the continued safe and secure use of the property.

The Proposed Project would allow new owner(s)/developer(s) to develop the property in accordance with the existing zoning. The Proposed Project would enable the City to respond to market conditions in the Airport area as new owner/developer(s) commit to the purchase of the City's land. This would allow those entities to develop the property to meet their respective needs, and those of the local clientele, provided the development is compliant with FAR Part 77 guidelines and is compatible with Airport operations (i.e., would not result in a hazard to aviation operations). The City would not sell/release parcel(s) to a new owner/developer(s) who would use the land for purposes that are incompatible with Airport operations or that attract wildlife hazardous to aviation. The Proposed Project would promote the Airport's financial self-sufficiency by generating non-aeronautical revenue through the sale of Airport property not required for aeronautical use.

Explanation

The Proposed Project would provide the City with non-aeronautical revenue from otherwise vacant Airport property. The sale/release of this property would not directly impact environmental resource categories described in FAA Orders 1050.1F or 5050.4B, while development of the property by a new owner/developer(s) could result in impacts to environmental resources. As a result, this EA

assesses the potential indirect effects of future development of the land based on the current light industrial zoning. These potential indirect effects are described in **Section 8**.

7. Describe the affected environment of the project area (terrain features, level of urbanization, sensitive populations, etc). Attach a map or drawing of the area with the location(s) of the proposed action(s) identified. Attachment? Yes___✓___ No_____

A project study area was established to characterize the existing conditions of areas that implementation of the Proposed Project might affect. As **Exhibit 4** shows, the project study area is about 117 acres and is undeveloped. Descriptions of the existing environmental characteristics of the project study area follow.[3] Information obtained during early agency coordination efforts for this EA are included in **Attachment A**.

Air Quality: Mecklenburg County is included in the Metropolitan Charlotte Interstate Air Quality Control Region.[4] Mecklenburg County was previously designated as a nonattainment area for carbon monoxide (CO) and nonattainment for 8-hour ozone. On September 18, 1995, the United States Environmental Protection Agency (USEPA) determined the area had attained the CO standard and on August 27, 2015, the USEPA determined the area had attained the ozone standard. The USEPA re-designated the region to attainment for these pollutants. The area now operates under a maintenance plan for CO and 8-hour ozone. The area is in attainment for all other criteria pollutants.

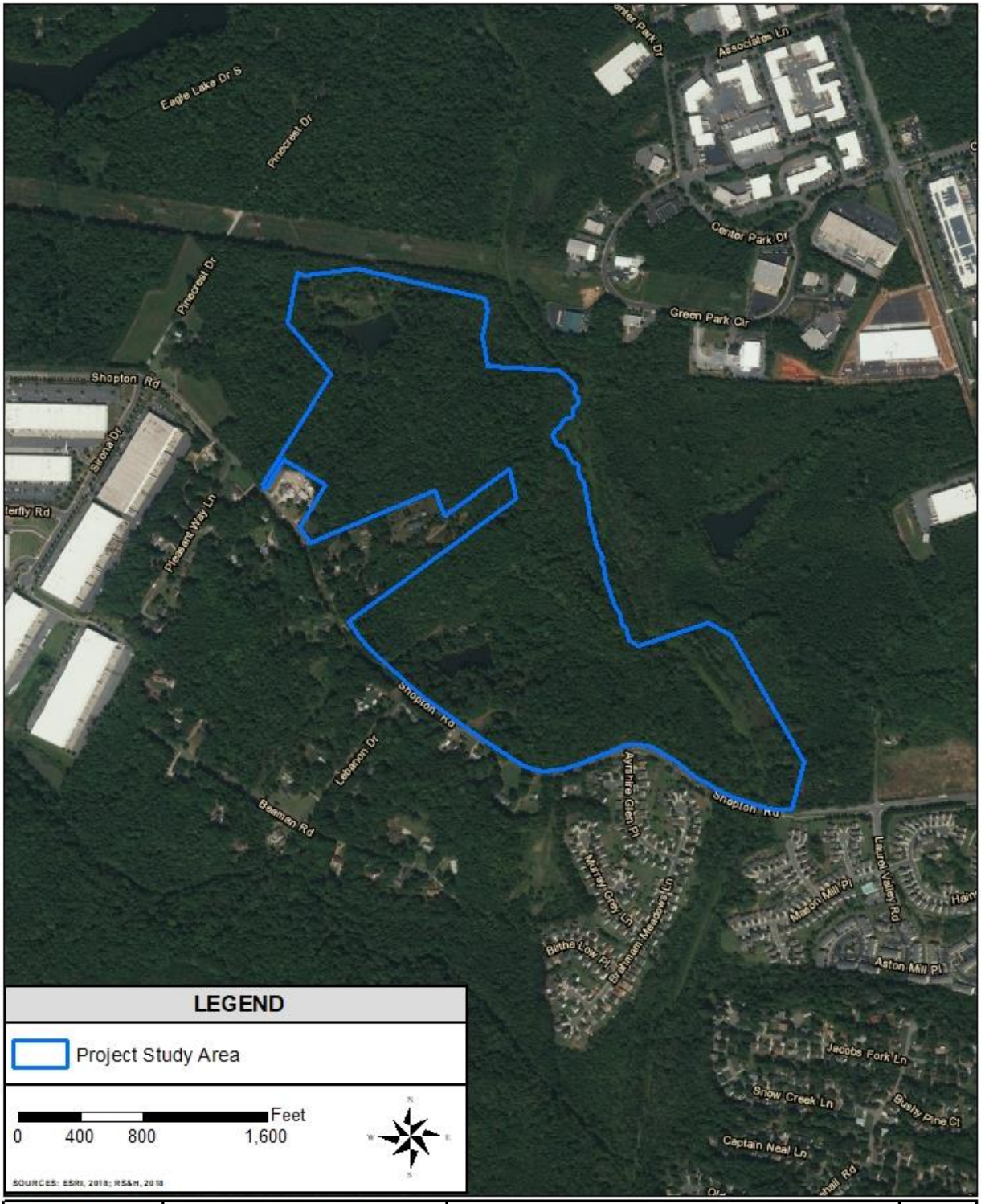
Biological Resources and Endangered and Threatened Species: A pedestrian habitat survey of the project study area was performed on December 18 and 19, 2018 (see **Attachment B**). Supporting habitat for potentially occurring federally-protected species was assessed in the field for the quality of physical and/or biological features essential to the conservation of the applicable species. Additionally, during the pedestrian habitat assessment, areas were reviewed for applicable federally protected species; however, formal surveys were not conducted.

The project study area consists of three terrestrial community types: maintained/disturbed, piedmont headwater stream forest, and mesic mixed hardwood forest. None of the on-site terrestrial community types are considered to be potential habitat for federally threatened or endangered species. Aquatic habitat is present within the project study area in the form of perennial streams, including six unnamed tributaries and Coffey Creek, but none of them are considered to be potential habitat for threatened or endangered species.

Threatened and Endangered Species:

The United States Fish and Wildlife Service (USFWS) database lists the Schweinitz's sunflower (*Helianthus schweinitzii*), Smooth Coneflower (*Echinacea laevigata*), Michaux's sumac (*Rhus michauxii*), Rusty-patched bumblebee (*Bombus affinis*), and the Carolina heelsplitter (*Lasmigona decorate*), all of which are federally-endangered species, as potentially occurring in Mecklenburg County.

[3] The environmental resource categories listed in this section are in accordance with the Desk Reference for FAA Order 1050.1F, which was issued after the FAA Memphis Airport District Office revised this Short Form EA.
[4] Metropolitan Charlotte Interstate Air Quality Control Region, 40 Code of Federal Regulations (CFR) §81.75. Retrieved December 2018, from U.S. Government Publishing Office: https://www.govinfo.gov/content/pkg/CFR-2012-title40-vol18/pdf/CFR-2012-title40-vol18-sec81-75.pdf



CLT CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT	*Environmental Assessment* *CHARLOTTE DOUGLAS INTERNATIONAL AIRPORT*	Project Study Area	EXHIBIT: 4

The recent listing of the Northern long-eared bat (*Myotis septentrionalis*) now requires consultation with the USFWS in accordance with the Final 4(d) Rule, which became effective on February 16, 2016. A letter was sent to the USFWS on January 25, 2018 requesting comments regarding the potential presence of federally protected species (see **Attachment A**). The USFWS recommends avoiding tree cutting from May 15 to August 15. If tree cutting occurs outside of these moratorium dates, the project is unlikely to adversely affect the Northern long-eared bat and no further consultation is needed. If tree clearing takes place between May 15 and August 15, consultation with the USFWS will be required.

A database search of the North Carolina Natural Heritage Program (NCNHP) was conducted for any federal or state protected species potentially occurring within Mecklenburg County. Based on the NCNHP data explorer review, there are no current records of federally-protected species within the project study area. The NCNHP database lists the Carolina Heelsplitter, Carolina Birdfoot-trefoil (*Acmispon helleri*), and the Tall Larkspur (*Delphinium exaltatum*) as potentially occurring within a one-mile radius of the project study area. However, according to the NCNHP, the Tall Larkspur and Carolina Heelsplitter populations are historical and have not been observed within the project study area since the 1800s, and 1918, respectively. The Carolina Birdfoot-trefoil has not been observed since May 1994. According to a North Carolina Wildlife Resources Commission correspondence (see Attachment A-2), there are current records of the state significantly rare plant Georgia holly (*Ilex longipes*) near the project study area. However, the Georgia holly was not observed within the project study area during the pedestrian habitat survey.

Climate: Greenhouse gases (GHG) are gases that trap heat in the earth's atmosphere. Both naturally occurring and man-made GHG's primarily include water vapor, carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Activities that require fuel or power are the primary stationary sources of GHGs at airports. Aircraft and ground access vehicles which are not under the control of an airport, typically generate more GHG emissions than airport controlled sources.

Research has shown there is a direct correlation between fuel combustion and GHG emissions. In terms of U.S. contributions, the General Accounting Office (GAO) reports that "domestic aviation contributes about three percent of total carbon dioxide emissions, according to EPA data," compared with other industrial sources including the remainder of the transportation sector (20%) and power generation (41%).[5] The International Civil Aviation Organization (ICAO) estimates that GHG emissions from aircraft account for roughly three percent of all anthropogenic GHG emission globally.[6] Climate change due to GHG emissions is a global phenomenon; therefore, the affected environment is the global climate.

Coastal Resources: Mecklenburg County is not within the "coastal area" defined by the North Carolina State Coastal Area Management Act. The Airport is not within a Coastal Barrier Resources

[5] U.S. Government Accountability Office. (2009, June). Aviation and Climate Change, Aircraft Emissions Expected to Grow, but Technological and Operational Improvements and Government Policies Can Help Control Emissions, GAO 09-554. Retrieved December 2018, from U.S. Government Accountability Office: https://www.gao.gov/new.items/d09554.pdf

[6] Melrose, A. (2010). European ATM and Climate Change Adaptation: A Scoping Study. In ICAO Environmental Branch, ICAO Environmental Report 2010: Aviation and Climate Change (pp. 195-198). Montreal: ICAO. Retrieved December 2018, from https://www.icao.int/environmental-protection/Documents/Publications/ENV_Report_2010.pdf

System (CBRS) unit.[7] The closest CBRS unit, Huntington Beach (SC-03), is about 156 miles southeast of the project study area.

Department of Transportation Act, Section 4(f): There are no Section 4(f) properties within the project study area. The closest Section 4(f) property is Renaissance Park, about 1.6 miles northeast of the project study area.[8]

Farmlands: The project study area is comprised of prime farmland soils (Cecil sandy clay loam, 2 – 8 percent slopes, moderately eroded and Monacan loam, if drained or protected from flooding), farmland of statewide importance soils (Cecil sandy clay loam, 8 – 15 percent slopes, moderately eroded), and not prime farmland soils (Pacolet sandy loam, water, and Wilkes loam).[9] The U.S. Census Bureau classifies the entire project study area as an urbanized area.[10] Under Section 523(10)(B) of the Farmland Protection Policy Act (FPPA), land that the U.S. Census Bureau identifies as urbanized areas is not subject to the provisions of the FPPA.

Hazardous Materials, Solid Waste, and Pollution Prevention: According to USEPA data, there are no National Priorities List sites within the project study area.[11] A Phase I Environmental Site Assessment (ESA) was completed in March 2018 (see **Attachment C**).

On March 9 and 13, 2018, site reconnaissance was conducted to inspect the parcels within the project study area for visible signs or indications of current recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs). The parcels were examined to the extent practicable for evidence of past usage, past use of petroleum, landfills, vents, pipes, and other items that may be considered a REC. In addition to the parcel assessments within the project study area, adjacent properties were also observed in a cursory manner. There are no existing structures within the project study area. Remnants of former residences on Parcels 14107125, 14107122, and 14107123 were observed. Several debris piles were found on Parcel 14107122 from former residences within that parcel. This debris included tires and discarded household trash. Several rusty 55-gallon drums were found on-site as well. No stained soil was observed near the drums. No evidence of RECs or HRECs was visible on site during the March 2018 site visit.

The Phase I ESA also included a review of environmental databases and records maintained by federal, state, and tribal agencies. These records were procured through EDR, Inc. In addition to the environmental databases and records review, regulatory records were obtained from NC Department of Environmental Quality (NCDEQ).

[7] USFWS. (2018). CBRS Mapper. Retrieved December 2018, from Coastal Barrier Resource System: https://www.fws.gov/CBRA/Maps/Mapper.html

[8] City of Charlotte. (2018). Mecklenburg County Park Map. Retrieved December 2018, from Parks: https://www.mecknc.gov/ParkandRec/Parks/Pages/default.aspx

[9] United States Department of Agriculture. (2018). Soil Survey of Mecklenburg County, North Carolina. Retrieved December 2018, from Natural Resources Conservation Service: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

[10] U.S. Census Bureau. 2010 Census – Urbanized Area Reference Map: Charlotte, NC—SC. Retrieved December 2018, from United States Census Bureau: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua15670_charlotte_nc--sc/DC10UA15670.pdf

[11] USEPA. (2018). National Priorities List (NPL) Sites – by State. Retrieved December 2018, from USEPA: https://www.epa.gov/superfund/national-priorities-list-npl-sites-state

An interview with representatives of the City was completed during the Phase I ESA, dated February 23, 2018. The interview was conducted to identify any known records or incidents that may be considered a REC. At the time of the February 2018 interview the City was not aware of any environmental conditions on site.

Historical, Architectural, Archeological, and Cultural Resources: The area of potential effect (APE) is the project study area. There are no known historic properties within the APE. The APE is undisturbed and is heavily vegetated. According to the North Carolina State Historic Preservation Office's GIS Service, the closest National Register of Historic Places (NRHP)-listed or eligible resource is the Hayes-Byrum Store and House located at W Side NC 160, about 1.5 miles west of the project study area.

Land Use: As **Section 4** describes, the City zoning for the parcels within the project study area is light industrial. This area is undeveloped and heavily vegetated. The areas surrounding the parcels are zoned as industrial, business-distribution, and residential, and are primarily developed with residential and industrial uses.[12]

A Wildlife Hazard Assessment (WHA) was conducted in 2013-2014 to update the 2005 WHA that addressed wildlife hazards on and in the vicinity of Airport property. The WHA assessed 11 offsite locations for wildlife hazards. Three of those locations are close in proximity to the project study area and have similar land use characteristics. Wildlife observed at these sites included: Canada geese, swallows, mergansers, ring-necked ducks, bufflehead, common grackles, and perching birds.[13]

Natural Resources and Energy Supplies: The project study area is within the Charlotte Metropolitan Area. This is an urbanized area with adequate access to energy and natural resources. Utilities (e.g., electric, water, sewer) are currently provided to the area as there are residences and businesses adjacent to the project study area. Duke Energy (electricity), Piedmont Natural Gas (natural gas), and the City of Charlotte (public water and sewer) currently provide utility services to surrounding areas.

Noise and Compatible Land Use: According to the 2015 Noise Exposure Map, the project study area is outside of the Airport's Day Night Average Sound Level (DNL) 65 decibel (dB) contour[14].

Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks: The parcels are within U.S. Census Tract 59.12 for Mecklenburg County, which according to the 2013-2017 American Community Survey, has a population of 5,233 people.[15] About 51% of the population are minorities and about 12% of the population are below the poverty level. About 23% of the population are children.[16]

[12] City of Charlotte. (2018). Zoning, Charlotte, NC. Retrieved December 2018, from Charlotte Planning Maps and Tools: http://charlotte.maps.arcgis.com/apps/webappviewer/index.html?id=ec2c9241a46d4b77ab424c7ca629bde7

[13] Wildlife Hazard Assessment of the Charlotte Douglas International Airport. (2013-2014). Charlotte Douglas International Airport.

[14] Charlotte Douglas International Airport. (2015, September). Noise Exposure Map Update. Retrieved February 2019, from Documents: http://www.airportsites.net/CLT-NEM/documents/draftnem/1-CLT_NEM_Draft_Cover-TOC.pdf

[15] U.S. Census Bureau. (2018). 2013-2017 American Community Survey 5-Year Estimates. Retrieved December 2018, from U.S. Census Bureau American Fact Finder: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_DP05&prodType=table

[16] This EA considers children those less than 18 years of age.

Comparatively, about 50% and 45% of the population in the City of Charlotte and Mecklenburg County, respectively, are minorities. About 15% and 13% of the population in the City of Charlotte and Mecklenburg County are below the poverty level. About 24% of the populations in the City of Charlotte and Mecklenburg County are children.

With regard to transportation, there are no roadways within the project study area. Shopton Road runs along the southern portion of the project study area. There are other roadways within the vicinity of the project study area, which include: Steele Creek Road, South Tryon Street (NC 49), Beam Road, Sandy Porter Road, and Sirona Drive. Locals would likely use major roads Shopton Road, Beam Road, South Tryon Road, and Steele Creek Road to access the project study area. The level of service (LOS) of the intersection of Beam Road and Shopton Road is F during the AM peak hour and F during the PM peak hour. The LOS of the intersection of South Tryon Road and Shopton Road is B during the AM peak hour and A during the PM peak hour. The LOS of the intersection of Steele Creek Road and Shopton Road is a D during the AM peak hour and E during the PM peak hour (see **Attachment D**).

Visual Environment: The project study area is currently undeveloped. The area around the project study area consists primarily of scattered residential, business, and industrial uses. Trees along the roadways and on the residential parcels prevents a direct line of sight to the project study area.

Water Resources: There are no Wild and Scenic Rivers (WSR) or Nationwide Rivers Inventory segments near the project study area. The closest WSR, Wilson Creek, is about 89 miles northwest of the project study area.[17]

Wetlands and Surface Waters: On December 18 and 19, 2018, project scientists delineated potential on-site jurisdictional waters of the U.S., including wetlands (see **Attachment E**). Potential jurisdictional areas were delineated (flagged in the field), classified, and mapped with a sub-foot unit using the U.S. Army Corps of Engineers (USACE) Routine On-Site Determination Method. This method is defined in the 1987 Corps of Engineers Delineation Manual, the 2007 USACE Jurisdictional Form Instructional Guidebook, with further technical guidance from the 2012 Eastern Mountains & Piedmont Regional Supplement. The results of the field investigation indicate there are 14 jurisdictional stream channels and seven jurisdictional wetlands within the project study area. See **Table 1** for a summary of the characteristics of the potential waters of the U.S. within the project study area. See **Attachment E** for a detailed description of the waters of the U.S. and the USACE Jurisdictional Determination.

[17] NPS. (2018). North Carolina. Retrieved December 2018, from Explore Designated Rivers: https://www.rivers.gov/north-carolina.php

Table 1
Summary of On-Site Delineated Potential Waters of the U.S.

Water Feature Type	Classification	Acreage (ac.)	Linear Feet (lf)
Jurisdictional Stream			
Coffey Creek	Perennial		1,485
Stream A	Intermittent		2,164
Stream 1A	Intermittent		147
Stream B	Intermittent		285
Stream C	Intermittent		595
Stream D	Perennial		304
Stream E	Intermittent Perennial		58 73
Stream F	Intermittent		234
Stream G	Intermittent		50
Stream H	Intermittent		287
Stream I	Perennial		1,073
Stream J	Perennial		446
Stream K	Intermittent		316
Stream L	Perennial		1,314
Total			8,831
Jurisdictional Wetland			
Wetland AA	Bottomland Hardwood Forest	1.52	
Wetland BB	Bottomland Hardwood Forest	0.18	
Wetland CC	Bottomland Hardwood Forest	0.09	
Wetland DD	Headwater Forest	0.32	
Wetland FF	Headwater Forest	0.01	
Wetland II	Bottomland Hardwood Forest	12.36	
Wetland JJ	Bottomland Hardwood Forest	5.35	
Total		19.83	

Source: CWS, Inc., 2019

Floodplains: The project study area is within the limits of the 100-year flood zone (Area AE) identified on FEMAs Flood Insurance Rate Map (FIRM) (Map # 3710452200K) (see Exhibit 3). [18]

Groundwater: There are no groundwater, sole source aquifers, or public water supplies in the project study area. The project study area is within the Upper Sugar Creek Watershed (Hydrologic

[18] FEMA. (2015, September 2). Flood Insurance Rate Map 3710452200K. Retrieved January 2019, from FEMA Flood Map Service Center: Search by Address: https://msc.fema.gov/portal/search?AddressQuery=charlotte%20douglas%20international%20airport#searchresultsanchor

Unit Code (HUC) 12: 030501030103.[19] The Charlotte-Mecklenburg Utility Department provides water and sanitary sewer services to the project study area.[20]

8. Environmental Consequences – Special Impact Categories (refer to corresponding sections in 5050.4B or 1050.1F, or subsequent revisions, for more information and direction to complete each category, including discussions of Thresholds of Significance Table 7-1).

(1) NOISE

1) Does the proposal require a noise analysis per Order 1050.1E, Appendix A? Explain. (Note: Noise sensitive land uses are defined in Table 1 of FAR Part 150). Yes ____ No __✓__

The Proposed Project would not change the number or type of aircraft forecast to operate at the Airport, nor would it alter runway use or flight track geometry. The Proposed Project would not change the Airport's current aviation noise contours.

In accordance with the City of Charlotte Noise Ordinance, it is unlawful to operate construction machinery in any residentially zoned area of the City or within 300 feet of any residentially occupied structure in any zone of the City between the hours of 9:00 p.m. and 7:00 a.m.[21]

2) If "yes," determine whether the proposed project is likely to have a significant impact on noise levels over noise sensitive areas within the DNL 65 dBA noise contour.

Not applicable. As **Section 8(1)(1)** describes, the Proposed Project does not require a noise analysis.

(2) COMPATIBLE LAND USE

(a) Would the proposed project result in other (besides noise) impacts exceeding thresholds of significance that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Explain.

The Proposed Project would not result in impacts that have land use ramifications, such as disruption of communities or relocation of residences or businesses; or impact natural resource areas. The City rezoned the project study area from residential to industrial in May 2018. The indirect effect of potential commercial or industrial development by the new owner/developer(s) would be consistent with the City of Charlotte zoning ordinances.

(b) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports"? Explain.

Yes. As **Section** 7 describes, the project study area is located within 1.5 miles from off-site locations identified in the WHA. The Airport's Wildlife Hazard Management Plan (WHMP) includes communication with property owners and zoning boards to encourage mitigating wildlife hazards.

[19] USEPA. (2019). NEPAssist. Retrieved May 2019, from USEPA: https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr=charlotte+douglas+international+airport
[20] Charlotte Water. (2019). Retrieved May 2019, from City of Charlotte: https://charlottenc.gov/water/Pages/Home.aspx
[21] City of Charlotte. (2011). City of Charlotte Noise Ordinance. Retrieved March 2019, from City of Charlotte: http://www.nonoise.org/lawlib/cities/ordinances/Charlotte,%20North%20Carolina.pdf

Light industrial development, compliant with the FAA-approved avigation easements associated with the sale between the City and the new owner/developer(s), would prevent the introduction of new wildlife hazards. The removal or manipulation of natural/vegetative habitat within the project study area associated with future development of the project site would decrease habitat for species considered hazardous to Airport operations. Such modification by a new owner/developer(s) would promote airport-compatible land use. Also, species habitat modification would provide effective long-term remedial measures for reducing wildlife hazards on, or near the Airport. This is supported by FAA Advisory Circular (AC) 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports, § 2-4 c. "…projects required to correct wildlife hazards from wetlands."

(3) SOCIAL IMPACTS

(a) Would the proposed project cause relocation of any homes or businesses? Yes____ No __✓__ Explain.

The Proposed Project would occur in undeveloped areas and would not require the relocation of any homes or businesses.

(b) If "yes," describe the availability of adequate relocation facilities

Not applicable. See **Section 8(3)(a)**.

(c) Would the proposed project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion? Explain.

The Proposed Project would increase surface traffic patterns. Development of the land by the new owners is expected to increase the number of vehicles accessing the site, since the land parcels are currently undeveloped. At this time, the future development of the Proposed Project is anticipated to include commercial and light-industrial businesses. The traffic study completed for this project indicates that new trips would be generated and the level of service would be impacted (discussed below)

A traffic impact analysis was completed for the area surrounding the project study area (see **Attachment D**). The analysis assumed that complete buildout of the project study area would be completed in 2022 and potential future development would be accessed by three proposed full movement- driveways on Shopton Road. A roundabout could potentially be constructed at the existing four-way stop controlled intersection of Shopton Road at Beam Road to accommodate traffic flow, which results from the business/industrial development of the land parcels.

The traffic generation potential of proposed development was determined using the trip generation rates published in *Trip Generation* (Institute of Transportation Engineers, Ninth Edition, 2012) for all land uses. Trip generation was based on generation rates for 1,000,000 square feet of industrial park and 1,000,000 square feet of warehouse space. During a typical weekday, potential development of the Proposed Project has the potential to generate 882 and 1,130 new net external trips during the AM and PM peak hours, respectively (9,228 total trips daily).

It was determined that buildout of the Proposed Project would impact the level of service (LOS) of area roadways. Specifically, the intersection of Steele Creek Road and Shopton Road would decrease from a LOS of D to F during the AM peak hour for the 2022 build condition. This LOS change would require mitigation based on North Carolina Department of Transportation (NCDOT) requirements.

The traffic impact analysis resulted in the following recommendations for improvements to intersection lane geometry and signal operations for intersections:

- Steele Creek Road at Shopton Road
  - Repurpose the existing northbound right-turn lane along Steele Creek Road into a northbound thru lane
  - Construct a second northbound receiving lane extending 1,000' north of the intersection and appropriate merge to one lane
  - Construct a northbound right-turn lane along Steele Creek Road with 565' of storage and 75' of taper
  - Repurpose chevron area on the westbound approach along Shopton Road into an additional westbound left-turn lane, creating dual westbound left-turn lanes
  - Optimize signal splits and offsets
- Shopton Road at Beam Road
  - Construct a westbound right-turn lane with a minimum of 75' of storage and appropriate taper
- South Tryon Street (NC 49) at Shopton Road
  - Construct a southbound right turn lane with a minimum of 250' of storage
  - Optimize signal splits and offsets

To date, the City acquired the right-of-way for a single-lane roundabout at the existing four-way stop controlled Beam Road at Shopton Road to help improve the LOS.

(4) INDUCED SOCIOECONOMIC IMPACTS

Would the proposed project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.?
Yes__✓__ No _____ Explain

Future development of the property to be sold would increase the economic activity in the community through the development of the land and operation of new businesses. Construction activity would cause short-term construction-related employment of local contractors, which could be considered a positive effect. This economic activity would be temporary and is not expected to cause a significant secondary (induced) impact to the surrounding area. The employment opportunities that a new owner/developer(s) could offer can also be considered a positive, long-term secondary impact.

Development would draw from regional resources. The potential development as a result of the sale of Airport property would not cause shifts in the projected population growth or cause changes to population movement. The Proposed Project's indirect effect would include an increase in utility services (e.g., electricity, water) by the new owner/developer(s) potential industrial or commercial business facilities. The utility services provided to the City of Charlotte and Mecklenburg County are not in short supply.

Because most employees for the potential future development are anticipated to be from the surrounding area, it is unlikely that demands on public school services would change. The new use of land could change the potential demand of the City's law enforcement and fire and life safety services when a more formal development plan is created and available from the future developer(s).

Construction and operation of the Proposed Project would not require the relocation of residents or businesses, nor increase exposure of environmental contaminants to children in the surrounding community. The Proposed Project would not cause significant environmental effects (e.g., air quality, water quality) and, therefore, the effects would not disproportionately affect any population surrounding the Airport.

(5) AIR QUALITY

(a) Does the proposed project have the potential to increase airside or landside capacity, including an increase in capacity to handle surface vehicles? Explain

The Proposed Project would not increase the airside or landside capacity of the Airport.

(b) Identify whether the project area is in a non-attainment or maintenance area for any of the criteria air pollutants having National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act Amendments (CAAA), and identify which pollutant(s) apply. If the proposed project is in an attainment area, no further air quality analysis is needed; skip to item (6). See EPA Green Book at www.epa.gov/oar/oaqps/greenbk for current attainment areas.

As **Section 7** describes, the project study area is in the Metropolitan Charlotte Interstate Air Quality Region, which operates under a maintenance plan for CO and 8-hour ozone.

(c) Is an air quality analysis needed with regard to indirect source review requirements or levels of aircraft activity (See Order 1050.1E and the 1997 FAA Handbook "Air Quality Procedures for Civilian Airports and Air Force Bases"). Explain. If "yes," comply with state requirements.

The business transaction of selling up to 117 acres of Airport property, including avigation easements, would not cause or create an increase in emissions.

The Proposed Project would increase emissions during construction, as well as during day-to-day access of the development once in operation. The exact development (including size and types of buildings/facilities) and associated number or potential employees and/or customers is not known at this time. For that reason, this section provides a qualitative analysis of the potential indirect air quality effects associated with the sale/release of up to 117 acres of Airport property.

Sources of air emissions potentially associated with land development include electrical usage (onsite generation of electricity using coal, oil, or natural gas), refrigerants (chemicals used for refrigeration or air conditioning), and waste management (emissions associated with solid waste generation).

The increase in vehicular traffic to and from the potential future development could increase the area's emissions. This scale of development (up to 117 acres) would draw employees and customers from Mecklenburg County, the City of Charlotte, and the region. The potential increase in local traffic would not constitute a significant increase in regional traffic and traffic-related emissions of the Charlotte area as a whole. Based on the Proposed Project's potential land uses and zoning within the project study area, the operation of future development in the project study area is not anticipated to cause significant effects to air quality.

(d)(1) Would the proposed action be an "exempted action," as defined in 40 C.F.R Part 51.853(c)(2) of the General Conformity Rule? If exempt, skip to item (6). List exemption claimed.

No. The Proposed Project and potential future development are not listed as exempt or presumed to conform.

(d)(2) Would the increase in the emission level of the regulated air pollutants for which the project area is in non-attainment or maintenance exceed the de minimis standards? Yes _____ No__✓___

Taking into consideration compliance with federal, state and local regulations, the staggering of construction activirties, and use of BMPs, the annual emissions from the potential development would not represent a net increase in regional activity.

(d)(3) If "no," would the proposed project cause a violation of any NAAQS, delay the attainment of any NAAQS, or worsen any existing NAAQS violation? Explain.

Compliance with federal, state, and local regulations, and the Proposed Project's potential land uses and zoning within the project study area, the operation of future development in the project study area is not anticipated to violate any NAAQS, delay attainment of any NAAQS or worsen existing NAAQS violations. . The selected construction contractor could also implement best management practices (BMPs) to control dust and other airborne particles to the maximum extent possible. BMPs could include, but are not limited to:

- regular maintenance of construction equipment;
- prohibiting the idling of construction vehicles for longer than five minutes;
- stabilizing construction roads; and/or
- stabilizing vehicle staging areas, or requiring that vehicles park on paved areas.

(d)(4) Would the proposed project conform to the State Implementation Plan (SIP) approved by the state air quality resource agency? Explain, and provide supporting documentation.

Compliance with federal, state, and local regulations and the Proposed Project's potential land uses and zoning within the project study area, the operation of future development in the project study area is not anticipated to cause significant effects to air quality.

The use of fossil fuel powered machinery during construction of the Proposed Project would emit GHGs such as CO2. These emissions would only last as long as construction activities. The increase in employees at the Airport would increase vehicle-related GHG emissions in the project study area. As Section 8(4) describes, the majority of the employees are likely to

already live and work in the area; therefore, the vehicle-related GHG emissions in the area would not significantly change. In addition, the Proposed Project would not increase the number of aircraft operating at the Airport. Overall, the Proposed Project would not have a significant effect on GHGs and the global climate.

(6) WATER QUALITY

Describe the potential of the proposed project to impact water quality, including ground water, surface water bodies, any public water supply systems, etc. Provide documentation of consultation with agencies having jurisdiction over such water bodies as applicable.

The Proposed Project would not impact surface waters such that water quality standards set by Federal, state, local, or tribal regulatory agencies would be exceeded nor would the Proposed Project have the potential to contaminate a public drinking water supply such that public health may be adversely affected. The future developer(s) would address potential impacts to public water distribution systems or sanitary sewage collection systems. At such time, the potential future developer(s) would verify the potential impacts with the local utility, as applicable.

During construction the selected construction contractor(s) would follow NCDEQ Minimum Design Criteria BMPs to minimize potential effects to water quality. Temporary erosion and sedimentation control and stormwater devices, including ponds, may be installed during the construction phase. The City would ensure that the selected construction contractor(s) would obtain a construction National Pollutant Discharge Elimination System (NPDES) construction permit prior to the start of ground disturbing activities. Adherence to the provisions of that permit would reduce potential effects to water quality. City of Charlotte Surface Water Improvement and Management (SWIM) buffers and Charlotte Post Construction Stormwater Ordinance (PCSO) buffers apply to jurisdictional surface waters within the project study area.

(7) DEPARTMENT OF TRANSPORTATION SECTION 303/4(f)

Does the proposed project require the use of any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance? Provide justification for your response. Include concurrence of appropriate officials having jurisdiction over such land regarding the use determination.

As **Section 7** describes, there are no publicly owned lands within the project study area. Future development of the land by the new owner/developer(s) would not directly affect (physically take) any publicly owned parks, recreation areas, or wildlife or waterfowl refuges of national, state, or local significance or land of a historic site of national, state, or local significance. The Proposed Project would not indirectly affect (constructively use) any public owned parks, recreation areas, or wildlife or waterfowl refuges of national, state, or local significance.

(8) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

(a) Describe any impact the proposed project might have on any properties in or eligible for inclusion in the National Register of Historic Places. Provide justification for your response, and include a record of your consultation with the State Historic Preservation Officer (SHPO), if applicable (attach correspondence with SHPO).

The Proposed Project would not have a direct effect on any properties listed in, or eligible for inclusion in the National Register of Historic Places.

Informal Section 106 coordination with the North Carolina Historic Preservation Office (NCHPO) was initiated with an early agency coordination letter (see **Attachment A**) and continued during the Draft EA review period concerning potential indirect effects to historic resources. As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NCHPO did not have any comments (see **Attachment G** for further information details).

(b) Describe whether there is reason to believe that significant scientific, prehistoric, historic, archeological, or paleontological resources would be lost or destroyed as a result of the proposed project. Include a record of consultation with persons or organizations with relevant expertise, including the SHPO, if applicable.

The Proposed Project would not have a direct effect on any properties listed in, or eligible for inclusion in the National Register of Historic Places. In the unlikely event that prehistoric or historic artifacts that could be associated with Native American, early European, or American settlement are encountered at any time within the APE, the selected construction contractor would cease all activities involving subsurface disturbance in the immediate area of the discovery. The City would contact the FAA and NCHPO, and project activities would not resume without verbal and written authorization from the FAA or NCHPO. As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NCHPO did not have any comments (see **Attachment G** for further information details).

(9) BIOTIC COMMUNITIES

Describe the potential of the proposed project to directly or indirectly impact plant communities and/or the displacement of wildlife. This answer should also reference Section 6, Water Quality, if jurisdictional water bodies are present.

The sale of up to 117 acres of Airport property, with associated avigation easements would not have any direct long-term or permanent loss of plants or wildlife species.

Construction activities associated with the Proposed Project would cause direct effects to vegetation communities in the project study area. As **Section 7** describes, the three main types of terrestrial communities are maintained/disturbed, piedmont headwater stream forest, and mesic mixed hardwood forest. The areas surrounding the project study area consist of scattered residential, commercial, and industrial areas. Construction Best Management Practices (BMPs) would be applied throughout construction activities to protect biotic and aquatic resources.

The project study area is surrounded by developed land and potential wildlife could consist of species that commonly inhabit urban areas. Because these urban species have adapted to the existing fragmented landscape and urban environment, the Proposed Project would not pose a significant direct effect to local terrestrial wildlife communities.

With regards to aquatic communities, the Proposed Project would not directly affect the streams within the project study area because of the required SWIM and PCSO buffers. The Proposed Project could have an indirect effect on the type and amount of aquatic organisms that could survive in the water due to increased volume of runoff and pollutants. The inclusion of a SWIM and PCSO buffers around the streams would reduce the volume of runoff and

pollutants that could enter the stream system. In addition, appropriate sediment and erosion control measures and adherence to permit provisions would be implemented during construction and operation of the Proposed Project to decrease the input of pollutants into the stream. For these reasons, the Proposed Project would not significantly affect aquatic communities.

As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NC Wildlife Resources Commission provided comments on the Draft EA. See **Attachment G** for responses to their comments.

(10) FEDERAL and STATE-LISTED ENDANGERED AND THREATENED SPECIES

Would the proposed project impact any federally- or state-listed or proposed endangered or threatened species of flora and fauna, or impact critical habitat? Explain, and discuss and attach records of consultation efforts with jurisdictional agencies, if applicable.

As **Section 7** describes, a pedestrian survey of the project study area was conducted on December 17 and 18, 2018 (see **Attachment B**).

The NCNHP records indicate that the Carolina Heelsplitter, Carolina Birdfoot-trefoil, and the Tall Larkspur have been observed within a one-mile radius of the project study area. However, the last observation date was the 1800s, 1919, and 1994, respectively. There are no other state-listed species recorded within one-mile of the project study area. Therefore, the Proposed Project would have no effect on the state-listed Carolina Heelsplitter, Carolina Birdfoot-trefoil, and the Tall Larkspur or other state-listed species. **Table 2** lists the federally-protected species with the potential to occur in the project study area and the effects determination. Only two of the seven species with the potential to occur in the general area are likely to occur in or near the project study area. Field investigations determined that these two species, the Carolina heelsplitter and the Northern-long-eared bat, were not present or likely to occur in the Project Study Area.

Table 2
Effects Determination for Federally-Protected species with the Potential to Occur in the Project Study Area

Scientific Name	Common Name	Federal Status*	Habitat Present	Effect on Listed Species
Helianthus schweinitzii	Schweinitz's sunflower	E	No	No Effect
Echinacea laevigata	Smooth coneflower	E	No	No Effect
Rhus michauxii	Michaux's sumac	E	No	No Effect
Lasmigona decorata	Carolina heelsplitter	T	No	MA-NLAA**
Bombus affinis	Rusty-patched bumblebee	E	No	No Effect
Myotis septentrionalis	Northern-long-eared bat	E	Yes	MA-NLAA**
Haliaeetus leucocephalus	Bald Eagle	Bald and Golden Eagle Protection Act	No	No Effect

*E – Endangered, T – Threatened

**May Affect – Not Likely to Adversely Affect
Sources: NCNHP 2019, CWS, 2019

Schweinitz's sunflower – A NCNHP data record review indicates that there are no current occurrences for this species within a one-mile radius of the project study area. Additionally, no Schweinitz's sunflowers were observed during the field investigation and no potential habitat was observed within the project study area. The project study area lacks supportive habitat due to frequent maintenance of roadside areas and lack of suitable soil types for the species. Therefore, the Proposed Project would have no effect on Schweinitz's sunflower.

Smooth coneflower – A NCNHP data record review indicates that there are no current occurrences for this species within a one-mile radius of the project study area. No individuals of smooth coneflower were observed during the field investigation. In addition, the field investigation found no habitat for this species within the project study area due to a lack of sufficient sunlight, frequent maintenance of roadside areas, and a competitive understory bordering the forested areas. Therefore, the Proposed Project would have no effect on the smooth coneflower.

Michaux's sumax – A NCNHP data record review indicates that there are no current occurrences of this species within the project study area, or within a one-mile radius of the project study area. No individuals of Michaux's sumax were observed during the field investigation. In addition, field investigation found no habitat for this species within the project study area due to lack of sufficient sunlight, maintained roadside areas, and competitive understory. Therefore, the Proposed Project would have no effect on the Michaux's sumax.

Carolina heelsplitter – The Carolina heelsplitter requires shaded areas in large rivers to small streams. A NCNHP report identified a historic record of the species in Sugar Creek, within one mile of the project study area. However, the record is dated 1918, and no Carolina heelsplitter populations are currently known to exist in Coffey Creek, located in the project study area. Additionally, on-site perennial streams consist of highly unstable banks with a silty bed, high sedimentation, and contain large amounts of woody debris. These stream conditions are considered unlikely habitat for the Carolina heelsplitter. Due to the historic record of the species within one mile of the project study area, the Proposed Project may affect, but is not likely to adversely affect the Carolina heelsplitter.

Rusty-patched bumblebee – According to USFWS guidance, "the rusty patched bumble bee is likely to be present in scattered locations that cover only about 0.1% of the species' historical range". According to the USFWS' Rusty Patched Bumble Bee Interactive Map, Mecklenburg County is not within the 0.1% historical range as no high potential zones or low potential zones are present within Mecklenburg County. Therefore, the Proposed Project would not affect the Rusty-patched bumblebee.

Northern long-eared bat – Suitable habitat for the Northern long-eared bat (NLEB) is present in the project study area in forested areas. The final 4(d) rule exempts incidental take of NLEB associated with activities that occur greater than 0.25 mile from a known hibernaculum site and greater than 150 feet from a known, occupied maternity roost from June 1-July 31. The nearest NLEB hibernaculum record is 74 miles away (EO ID 34299) and no known NLEB roost trees occurs within 150 feet of the project study area. Given these circumstances, USACE's Alternative Local Procedure (ALP) 1 would be used. USACE coordination would be done upon

receipt of a SLOPES application from the future developer(s). At that time, USACE would coordinate with the USFWS regarding the Proposed Project.

Bald Eagle – Habitat for the bald eagle primarily consists of mature forest in proximity to large bodies of open water for foraging. Large dominant trees are utilized for nesting sites, typically within one mile of open water. No bald eagles or bald eagle nests were observed during the field investigation. Additionally, according to NCNHP data, there are no known occurrences of the bald eagle within a one-mile radius of the project study area. Therefore, the Proposed Project would not affect the Bald Eagle.

As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NC Wildlife Resources Commission provided comments on the Draft EA. See **Attachment G** for responses to their comments.

(11) WETLANDS

Does the proposed project involve the modification of delineated wetlands (Delineations must be performed by a person certified in wetlands delineation)? Provide documentation of consultation with agencies having jurisdiction over wetlands and include wetland inventory maps when appropriate.

The Proposed Project (sale of up to about 117 acres of Airport property) would not directly impact federal or state regulated wetlands or non-jurisdictional wetlands.

Future development of the release could indirectly impact wetlands. As described in **Section 7**, a wetland delineation of the project study area was conducted for this EA. The delineation identified 19.83 acres of wetlands and 8,831 linear feet of stream within the project study area.

The future land developer would be required to coordinate with federal, state, and local agencies and to ensure that all required permits are obtained prior to the start of land-clearing and construction activities. Development over one acre would require the new owner/developer(s) to apply for a NPDES construction permit. If the new owner/developer's project results in wetland impacts, each project would need to be coordinated with the USACE and NCDEQ and the appropriate permits would need to be obtained. USACE permits could include Nationwide or Individual permits under Section 404 of the Clean Water Act for wetlands impacts. The selected construction contractor would be required to fill out a Pre-Construction Notification (PCN) form prior to applying for a Section 404/401 Nationwide Permit.

Any impacts to wetlands, would be minimized to the extent practicable and subject to permit conditions that would ensure that those potential impacts would be properly mitigated; therefore, significant impacts to wetlands are not anticipated.

(12) FLOODPLAINS

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)?
Yes__✓___ No_____

(b) Would the proposed project be located in a 500-year floodplain, as designated by FEMA?
Yes_____ No__✓___

(c) If "yes," is the proposed project considered a "critical action", as defined in the Water Resources Council Floodplain Management Guidelines? (see FR Vol. 43, No. 29, 2/10/78) Yes____ No__✓__

(d) You must attach the corresponding FEMA Flood Insurance Rate Map (FIRM) or other documentation showing the project area. Map attached? Yes__✓___ No_____ If "no," why not?

(e) If the proposed project would cause an encroachment of a base floodplain (the base floodplain is the 100-year floodplain for non-critical actions and the 500-year floodplain for critical actions), what measures would be taken to provide an opportunity for early public review, in accordance with Order 1050.1E, Appendix A, Section 9.2.c?

See **Attachment F** for the FEMA Flood Insurance Rate Maps for the project study area. The Proposed Project is located within the 100-Year Floodplain. However, the Airport plans to include easements into the sale of the property that would restrict future development from occurring within the 100-year floodplain. If development is proposed to occur within the floodplain, the new owner(s)/developer(s) would need to coordinate with FEMA and local floodplain coordinators in order to negotiate the mitigation of potential impacts on the 100-year floodplain. As part of the NC State Clearinghouse reply correspondence for the Draft EA, the Floodplain Management Program did not have any comments (see **Attachment G** for further information details).

(13) COASTAL ZONE MANAGEMENT PROGRAM

(a) Would the proposed project occur in, or affect, a coastal zone, as defined by a state's Coastal Zone Management Plan (CZMP)? Explain.

As **Section** 7 describes, Mecklenburg County is not within the "coastal area" defined by the North Carolina State Coastal Area Management Act.

(b) If "yes," is the project consistent with the State's CZMP? Explain. If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification. Early coordination is recommended.

Not applicable; the Proposed Project is not located within the State's CZMP.

(14) COASTAL BARRIERS

Is the location of the proposed project within the Coastal Barrier Resources System, as delineated by the US Fish and Wildlife Service (FWS) or FEMA coastal barrier maps? Explain.

The Proposed Project would not affect any CBRS units. As **Section 7** describes, the closest CBRS unit is about 156 miles southeast of the project study area.

(15) WILD AND SCENIC RIVERS

Would the proposed project affect any portion of the free-flowing characteristics of a Wild and Scenic River or a Study River, or any adjacent areas that are part of such rivers, listed on the Wild and Scenic Rivers Inventory? Consult the (regional) National Parks Service (NPS), U.S.

Forest Service (FS), or other appropriate federal authority for information. Early consultation is recommended.

As **Section 7** describes, the closest designated Scenic River Segment is the Wilson Creek, about 89 miles northwest of the project study area. Additionally, the Proposed Project would not affect water quality in the area (see **Section 8(6)**).

(16) FARMLAND

(a) Would the proposed project involve the use of federal financial assistance or conversion of federal government land? Explain

The Proposed Project would not involve the use of federal financial assistance or conversion of farmland. As **Section 7** describes, there are no farmlands within the project study area.

(b) If "yes" would it convert farmland protected by the Farmland Protection Policy Act (FPPA) (prime or unique farmland) to non-agricultural uses? Yes_____ No__✓___

Not applicable; see **Section 8(16)(a)**.

(c) If "yes," determine the extent of project-related farmland impacts by completing (and submitting to the Natural Resources Conservation Service) the "Farmland Conversion Impact Rating Form" (NRCS Form AD 1006). Coordinate with the state or local agricultural authorities. Explain your response, and attach the Form AD 1006, if applicable.

Not applicable; see **Section 8(16)(a)**.

(17) ENERGY SUPPLY AND NATURAL RESOURCES

What effect would the proposed project have on energy or other natural resource consumption? Would demand exceed supply? Explain. Letters from local public utilities and suppliers regarding their abilities to provide energy and resources needed for large projects may be necessary.

The Proposed Project would not have a direct effect on natural resource and energy consumption. Construction by the new owner/developer(s) would result in temporary increases in energy demand. Development could require the use of aggregate, sub-base materials, and oils, as well as various metals. Additionally, trucks and construction equipment would consume fuels as needed for construction purposes. None of these materials are rare or in short supply.

The Proposed Project would be an increase in the use of natural resources and the energy supply demand in the local area. The indirect effects of the Proposed Project would depend upon specific development plans, which are not known at this time. The Proposed Project's indirect effect would include an increased use in electricity by the potential industrial or commercial facilities. In addition, restrooms and water fountains for employees would increase the use of potable water. Electrical and water supplies are not in short supply in this region. Therefore, the scale of future industrial/commercial development would not represent a material increase in regional energy demand or consumption of natural resources.

(18) LIGHT EMISSIONS

Would the proposed project have the potential for airport-related lighting impacts on nearby residents? Explain, and, if necessary, provide a map depicting the location of residences in the airport vicinity in relation to the proposed lighting system.

The Proposed Project would not have the potential to create annoyance or interfere with normal activities from light emissions for nearby residents. Lighting associated with the potential future development of the land would focus on specific areas (e.g., roadways, parking, buildings) to ensure the safe movement of vehicles and people. The lighting would be directional and focused. Further, this development would be consistent with the existing zoning in the surrounding area.

With the sale of up to117 acres of Airport property, an avigation easement(s) between the City and the new owner/developer(s) would assure light emissions associated with the potential development would be consistent with the continuation of safe arrival/departure operations at the Airport.

(19) SOLID WASTE

Would the proposed project generate solid waste? Yes__✓___ No_____
If "yes," are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Explain.

The sale of up to 117 acres of Airport property would not directly generate solid waste. Future development of the property would generate solid waste. The new owner/developer(s) would be responsible for properly managing and disposing of solid waste in accordance with the City of Charlotte solid waste regulations. The Charlotte Motor Speedway Landfill would be able to accommodate any waste generated from the potential development. The new owner/developer(s) would also be required to remove and properly dispose of any and all waste materials that may result from all construction activities and operations. As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NC Solid Waste Section provided comments on the Draft EA. See **Attachment G** for responses to their comments.

(20) CONSTRUCTION IMPACTS

Would construction of the proposed project: 1) increase ambient noise levels due to equipment operation; 2) degrade local air quality due to dust, equipment exhausts and burning debris; 3) deteriorate water quality when erosion and pollutant runoff occur; 4) or disrupt off-site and local traffic patterns? Explain.

1) Temporary noise effects are anticipated from construction vehicles entering and exiting the project study area and the use of construction equipment for development of the Proposed Project. Construction noise would increase ambient noise levels. Grading and scraping are the noisiest activities, with equipment noise levels as high as 70 to 90 decibels within 50 feet of those operations. Noise attenuates (reduces) at a rate of 6 decibels per doubling of distance. Without accounting for shielding due to terrain or vegetation, noise levels at the closest residential area would be about 69 to 89 decibels. Assuming a 20 decibel noise level reduction for typical residential construction,[22] levels inside homes would likely be on the order of 49 to 69 decibels while construction equipment is being operated. Construction equipment would not

[22] Federal Aviation Regulation Part 150, Table 1, Note: Noise Level Reduction "…In most places, typical building construction automatically provides a [noise level reduction] of 20 decibels."

be used non-stop for extended periods; rather, it would be used intermittently and as needed. In addition, construction activities typically do not occur at night, which reduces the potential for disturbance. Therefore, temporary increase in construction noise would not cause a significant effect to noise sensitive land uses.

2) Construction of the Proposed Project would not significantly affect air quality. Construction would cause a temporary increase in construction equipment emissions. The selected construction contractor(s) could use BMPs, to the extent practicable, to reduce criteria pollutant emissions. These BMPs include, but are not limited to: regular maintenance of construction equipment, watering exposed surfaces twice per day (e.g. parking areas, staging areas, soil pipes, graded areas, and unpaved access roads); covering all haul trucks transporting soil, sand, or other loose material off-site; removing all visible mud or dirt track-out on adjacent public roads using wet power vacuum street sweepers at least once per day; prohibiting the use of dry power sweeping; limiting all vehicle speeds on unpaved roads to 15 miles per hour; minimizing idling time either by shutting equipment off when not in use or reducing the maximum idling time to five minutes; and minimizing the area of erodible earth that is exposed.

3) The selected construction contractor(s) could use biodegradable and wildlife-friendly sediment and erosion control devices. For example, silt fences, fiber rolls, and/or other products could have loose-weave netting that is made of natural fiber materials with movable joints between the vertical and horizontal twines. The selected construction contractor(s) should routinely inspect and properly maintain any sediment and erosion control measures implemented during construction of the Proposed Project. The selected construction contractor(s) would also adhere to the provisions of the construction NPDES permit, further minimizing potential construction-related effects to water quality.

4) There is the potential for a temporary increase in transportation activities along Shopton Road, Steele Creek Road, South Tryon Road, Beam Road, and other local roads from construction workers and equipment accessing the project study area. The potential increase would be temporary and last only as long as construction, and would not permanently affect the level of service of those roadways.

(21) OTHER CONSIDERATIONS

(a) Is the proposed project likely to be highly controversial on environmental grounds? Explain.

The City does not anticipate the Proposed Project to be highly controversial on environmental grounds. As **Section 8** describes, the Proposed Project would not cause significant environmental effects, would not change the operational characteristics of the Airport, and would be consistent with the City's zoning and land use plans.

(b) Is the proposed project likely to be inconsistent with any federal, state or local law or administrative determination relating to the environment? Explain.

The Proposed Project would be consistent with federal, state, and local laws or administrative determinations regarding the environment.

(c) Is the proposed project reasonably consistent with plans, goals, policies, or controls that have been adopted for the area in which the airport is located? Explain

The Proposed Project would be consistent with the zoning and future land use plans that have been adopted by the City of Charlotte and Mecklenburg County.

(22) HAZARDOUS SITES/MATERIALS

Would the proposed project require the use of land that may contain hazardous substances or may be contaminated? Explain your response and describe how such land was evaluated for hazardous substance contamination. Early consultation with appropriate expertise agencies (e.g., US Environmental Protection Agency (EPA), EPA-certified state and local governments) is recommended.

As **Section 7** of this EA describes, a Phase I ESA was completed for the Proposed Project (see **Attachment C**). The Proposed Project would not affect any RECs based on current on-site activities; HRECs; or, controlled CRECs.

Several areas were encountered during the site assessment which contained a combination of debris, including discarded tires and discarded household trash. These items would be disposed of in accordance with all federal, state, and local regulations. It is recommended that prior to conducting any land disturbing activities which involve excavation, soil and groundwater samples be obtained to rule out the presence of historical or active contaminants and to characterize these constituents in order that they may be disposed of in a properly regulated landfill in the state of North Carolina. As part of the NC State Clearinghouse reply correspondence for the Draft EA, the NC Inactive Hazardous Sites Branch provided comments on the Draft EA. See **Attachment G** for responses to their comments.

(23) PERMITS

List all required permits for the proposed project. Indicate whether any difficulties are anticipated in obtaining the required permits.

No permits are required as part of the Proposed Project. Prior to construction of the land, the new owner/developer(s) or their construction contractor(s) would need to apply for, and obtain, permits from various federal, state, and local departments/agencies, develop project specific plans, and adhere to state/NPDES general permits.

The Proposed Project would require building permits, a NPDES construction permit, and an Erosion and Sediment Control Permit. If development would affect wetlands or other waters of the U.S., a USACE Section 404 permit would be required. This permit would be obtained prior to the start of ground disturbing activities. The future tenants would also be responsible for obtaining any necessary permits for the operation and maintenance of the proposed facilities. The future tenants would also be responsible for complying with all federal, state, and local rules and regulations pertaining to activities on the premises.

NOTE: Even though the airport sponsor has/shall obtain one or more permits from the appropriate federal, state, and/or local agencies for the proposed project, initiation of such project shall NOT be approved until FAA has issued its environmental determination.

(24) ENVIRONMENTAL JUSTICE

Would the proposed project impact minority and/or low-income populations? Consider human health, social, economic, and environmental issues in your evaluation. Explain.

As described throughout **Section 8**, the Proposed Project would not have significant environmental effects and would not increase exposure of environmental contaminants to children in the community. Therefore, the Proposed Project would not disproportionately affect minority and/or low-income populations nor children's environmental health and safety risks.

(25) CUMULATIVE IMPACTS

When considered together with other past, present, and reasonably foreseeable future development projects on or off the airport, federal or non-federal, would the proposed project produce a cumulative effect on any of the environmental impact categories above? You should consider projects that are connected, cumulative and similar (common timing and geography). Provide a list of such projects considered. For purposes of this Evaluation Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

The CEQ Regulations define a *cumulative impact* as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions…"[23]

Past and present approved projects at the Airport include:

- Air cargo carrier facilities expansion
- New overflow truck parking
- Main Terminal Roof Replacement
- Security Enhancement Upgrades
- Airfield Pavement Improvements
- Tree Clearing and Removal
- Express Catering Demolition
- 2000 EIS Master Land Plan South House Demolitions
- High Intensity Runway Lighting System (HIRLS) and Cable
- Runway 18C/36C Joint Seal Replacement
- Runway 18L/36R Rehabilitation and Taxiway C7 removal
- Runway 18R/36L PAPI Lighting System Replacement
- Perimeter Fence Upgrade Phase 1

The Airport's proposed future development projects include

- Development of the east side general aviation (GA) campus
- New Joint Operations Center
- New 4th parallel runway
- Concourse A Phase 2 Expansion
- North End-Around Taxiway
- Relocation of the Carolina Museum and expansion of the museum's apron
- Runway 18C/36C Tree Removal
- Aircraft Rescue Fire Fighting Facility
- Additional non-aviation development on Airport property

Potential effects include an increase in stormwater run-off due to an increase in impervious surfaces, an increase in solid waste generation, and temporary construction impacts. The stormwater management system would be modified as needed to accommodate the increase in

[23] FAA Order 1050.1F Desk Reference. July 2015.

impervious surface due to cumulative projects at the Airport. Additionally, the Airport's NPDES stormwater management permit is routinely amended as necessary to accommodate the stormwater runoff of ongoing development. The increase in solid waste due to the cumulative projects at the Airport can be adequately handled by local landfills (i.e., Mecklenburg County Landfill). In accordance with Airport Sponsor policies, projects at the Airport are constructed in accordance with applicable rules, regulations, and permit stipulations. Additionally, construction contractors are required to employ BMPs to reduce potential construction-related effects.

The potential incremental effects would not cause or contribute to a significant effect on the environment when considered in combination with the effects of other past, present, or reasonably foreseeable future actions.

10. MITIGATION

(a) Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated, or that cannot be mitigated below the threshold of significance (See 5050.4B & 1050.1E, Appendix A).

The Proposed Project would not result in significant impact to any of the environmental resource categories described in **Section 8**. Future developers would be responsible for providing mitigation through the various permitting processes.

(b) Provide a description of the resources that are in or adjacent to the project area that must be avoided during construction. **Note:** The mitigation measures should be incorporated into the project's design documents.

The potential indirect effects to jurisdictional wetland impacts as a result of future development of the property to be sold would be subject to permitting requirements under Section 404 of the Clean Water Act. Such impacts could be mitigated by the new owner/developer(s) via the purchase of off-site wetland credits in the same hydrologic unit code (HUC) (HUC ID 03050103).

If wetland credits are not available in the same HUC code, payment into the Statewide Stream/Wetland Program may be completed by the new owner/developer(s). A detailed mitigation plan would be developed and reviewed by USACE and NCDEQ prior to the start of any construction activities which would impact wetlands.

11. PUBLIC INVOLVEMENT

Describe what efforts would be made to involve the public with this proposed project. Discuss the appropriateness of holding public meetings and/or public hearings, making the draft document available for public comment, or the preparation of a public involvement plan, etc.

Early Coordination – On January 25, 2018, RS&H, Inc., on behalf of the City, distributed an early coordination package to various federal, state, and local agencies. The packet discussed the preparation of an EA for the sale of Airport property, sought additional relevant information agencies may have regarding the project site and/or environs, and provided the opportunity for agencies to comment on the Proposed Project's potential environmental, social, and economic issues.

The information obtained during the early agency coordination effort was used, as appropriate, during the preparation of this EA. See **Attachment A-1** for the coordination package and distribution list. **Attachment A-2** includes correspondence received regarding the Proposed Project.

Draft EA Agency and Public Outreach – The Draft EA was available via a Notice of Availability published in the Charlotte Observer on May 17, 2019. Agencies and the public had a 30-day review period to review and comment on the Draft EA at the FAA Memphis Airports District Office, the CLT Center, and Charlotte Mecklenburg Library – West (see **Attachment G**).

Table 3 lists all agencies and/or persons consulted with regard to the preparation of this EA.

Table 3
Agencies and Persons Consulted for this EA

Agency Name	Federal, State, or Local	Contact Name(s)
Federal Aviation Administration	Federal	Mr. Tim Alexander
USFWS	Federal	Mr. Byron Hampstead
USEPA	Federal	Mr. Christopher Militscher Mr. Larry Gissentana
USACE	Federal	Mr. David L. Shaeffer
NC Environmental Review Clearinghouse	State	Ms. Crystal Best
Charlotte Department of Transportation	State	Ms. Johanna Quinn

Source: RS&H, Inc. 2019

12. PREPARER CERTIFICATION
I certify that the information I have provided above is, to the best of my knowledge, correct.

_____ 9/5/19
Signature Date

David Alberts – Project Manager
Name, Title

RS&H, Inc.
Affiliation

13. AIPORT SPONSOR CERTIFICATION
I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred.

_____ 9/5/19
Signature Date

Amber Leathers, C.M., ACE, Senior Airport Planning Coordinator
Name, Title

City of Charlotte Aviation Department
Affiliation