



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 03 2004

REPLY TO THE ATTENTION OF:

B-19J

Laura D. Morland, P.E.
Mead & Hunt
6501 Watts Road
Madison, Wisconsin 53719-2700

Re: Comments on the Environmental Assessment for the Capital City Municipal Airport
Runway Expansion, Lansing, Michigan

Dear Ms. Morland:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the draft Purpose and Need and Alternatives sections currently being considered for an Environmental Assessment (EA) covering the proposed runway extension at Capital City Municipal Airport (Airport). These documents were sent to various federal and state agencies and local units of government in an effort to obtain concurrence before proceeding with the drafting of the EA. Our comments in this letter are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The proposed project includes the extension of the main runway by 1,250 ft. According to the draft Purpose & Need chapter, the current runway length is inadequate. Current Airport users, both air carrier and cargo aircraft, are unable to operate at full payload potential during the warmer summer months and during the winter months when ice and snow contaminate the runway.

The preferred alternative will provide adequate runway length to address the current inadequacy for current and future users. In addition, a parallel taxiway, run-up apron, and relocation of lighting and navigational aids will take place. To accommodate the lengthened runway, land acquisition, the relocation of Dewitt Road, and the relocation of the East Airport Service Drive will also be required. We have some ideas that you might want to incorporate in the Purpose and Need section and one concern regarding the Preferred Alternative.

Purpose and Need Section

The analysis of runway needs was accomplished as part of the 1995 Capital City Airport Master Plan. The focus of the proposed project is to enhance the Airport's ability to provide dependable aviation services to existing aviation users, particularly the MD-82, 83 and 87 aircraft as well as the B-737, B767, and the DC-8 aircraft. These aircraft types are the ones most impacted by the current primary runway length. Existing aircraft would also benefit from the proposed runway

extension because it would allow increased instage lengths. This would produce a positive economic situation whereby new markets could be reached by existing users from the Airport.

The draft documentation does an excellent job of describing the runway length requirements depending on daily temperature and weight of a fully-loaded aircraft. Depending upon the temperature (standard, or 59°F; or standard + 15°C, or 84°F), certain aircraft are forced to operate on the Airport's existing runway length with reduced payloads. However, the documentation does not speak to the number of reduced payload operations per airline. We believe this information should be included in the documentation to produce a more complete analysis of the problem associated with existing runway length and current users. For instance, Allegiant Air currently limits its airplanes to 140 passengers, but the draft Purpose and Need section does not state how many passengers were forced to reschedule during the course of Allegiant Air's operations at the Airport to avoid exceeding the safe payload limit.

Information regarding number of reduced payload operations per aircraft should also be provided for B-737, B767, and DC-8 aircraft. In addition, information regarding runway length requirements should be included for the DC-8 aircraft used by United Parcel Service. This type of information would be useful in assessing current problems and how they could be alleviated by the proposed runway extension.


Lastly, aviation operation projections are listed in Exhibit 2-6, Capital City Airport Activity Forecasts. We suggest a summary of historic air traffic control tower records be included as part of the forecast as well as the assumptions made when deriving forecasted figures. This data will serve to explain how the forecasts were developed. The document should also explain how the proposed improvement would support increased airport usage by other aircraft types and long haul services.

Alternatives Section

Based on our review of the draft Alternatives section, we believe the Preferred Alternative is reasonable. We strongly suggest the revised EA address the possibility of revising the Preferred Alternative to move the future location of DeWitt Road to the east. This revision would preclude the fragmentation of the woodlot at the southern end of relocated DeWitt Road. This revision should be evaluated in light of the need for runway safety areas at the end of the proposed runway extension. To that end, the forthcoming EA should address mitigation for upland loss. We suggest voluntary mitigation for upland habitat at a ratio of 1:1.

We appreciate the opportunity to provide comments on the proposed sections of the EA. We look forward to reviewing a copy of the Environmental Assessment once it has been finalized. Should you have any questions, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via e-mail at kowal.kathleen@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch

cc: Brad Davidson, Environmental Protection Specialist, Detroit Airports District Office,
DET-600, Federal Aviation Administration, 11677 South Wayne Road, Suite 107,
Romulus, Michigan 48174

Tim Watkins, Bureau of Aeronautics, Michigan Department of Transportation, 2700 East
Airport Service Drive, Lansing, Michigan 48906-2171



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JUN 18 2004

REPLY TO THE ATTENTION OF:

B-19J

Laura D. Morland, P.E.
Mead & Hunt
6501 Watts Road
Madison, Wisconsin 53719-2700

Re: Scoping Comments for the Capital City Airport Expansion, Lansing, Michigan

Dear Ms. Morland:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the meeting minutes of an agency scoping meeting held on May 19, 2004 identifying proposed improvements to the Capital City Municipal Airport (Airport). Our comments in this letter are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The scoping letter identifies several improvements to meet operational demands for the current fleet of aircraft operating at and anticipated to be using the Airport. Improvements include:

- extension of Runway 10R-28L by 1,250 ft.;
- construction of parallel taxiway extension and run-up apron;
- relocation of navigational aids;
- road relocations; and
- property acquisition including several residences.

Based on information contained in the meeting minutes, we recommend the forthcoming Environmental Assessment (EA) be developed with consideration of the following points:

- ▶ The purpose and need statement should be a clear and concise discussion of the proposed project (e.g., what is the problem that can be alleviated by this project?). Sufficient background information should be supplied to support the range of alternatives selected for evaluation, including the type and number of aircraft in the current fleet and future potential users.
- ▶ The EA should include a range of reasonable alternatives including the no-build alternative. Providing a range of alternatives enables reviewers to effectively compare them based on the benefits of implementing one design over another in addition to possible environmental impacts and mitigation strategies associated with each alternative. This section should discuss: 1) how each alternative meets the purpose and need for the project, 2) differences in performance

between alternatives 3) how each alternative complies with local land use plans, and 4) whether the selection of one design alternative versus another would have some direct or indirect impacts on land use changes.

- ▶ The EA should include sections which describe the affected environment as well as mitigation plans. The affected environment section should include a description of the characteristics of the immediate and surrounding environment (i.e., woodlands, wetlands, residences, water resources, air quality, state or federally threatened or endangered species, land use, and cultural and historical resources). Likewise, the EA should include a mitigation plan which describes proposed mitigation and quantifies the reduction of adverse impacts to resources.
- ▶ The EA should provide a detailed stormwater management plan covering both the quantity and quality of runoff. Additional impermeable surfaces will likely increase the amount of runoff containing metals, de-icing compounds, and other contaminants, which could negatively impact water bodies. Also, the EA should discuss whether the creeks receiving runoff or the water bodies they drain into are designated as impaired. If any of these waterbodies are impaired, please include a discussion covering mitigation.
- ▶ According to the U.S. EPA State Designations for 8-Hour Ground-level Ozone Designations webpage (<http://www.epa.gov/ozonedesignations/regions/region5desig.htm>), Clinton, Eaton, and Ingham Counties have a classification of basic non-attainment. Areas categorized as basic non-attainment areas will have to comply with the more general non-attainment requirements of the Clean Air Act. In the forthcoming EA, please discuss coordination of the proposed project, particularly if additional future users are attracted to the improved Airport, with the U.S. EPA and state air quality agencies to ensure that evolving conformity requirements to reduce ozone-forming pollution are fulfilled.
- ▶ The EA should analyze potential cumulative impacts. Cumulative impacts analyses assess the incremental impacts on each resource due to connected and unconnected actions taking place in a geographic area over time (i.e., past, present, and future). The cumulative impacts analysis identifies the significance of impacts to a particular resource and the appropriate type and level of mitigation required to offset proposed impacts. The appropriate area of consideration and time frame to use when assessing cumulative impacts varies depending on the resource being considered (i.e., mature trees v. young trees). In addition, the EA should discuss the compatibility of the proposed project to local and regional land use plans.

The U.S. EPA appreciates the opportunity to provide early coordination comments on the proposed improvements to the Airport. We look forward to reviewing a copy of the Environmental Assessment. Should you have any questions, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via e-mail at kowal.kathleen@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch

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