

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
CENTRAL REGION

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***FINDING OF NO SIGNIFICANT IMPACT  
AND  
RECORD OF DECISION***

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**Proposed Consolidated Terminal Program**

St. Louis Lambert International Airport  
St. Louis, St. Louis County, Missouri

**CEQ Unique ID: EAXX-021-12-ARP-1726844592**



October 2024

## GENERAL INFORMATION ABOUT THIS DOCUMENT

**WHAT'S IN THIS DOCUMENT?** This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) and Record of Decision (ROD) for the proposed Consolidated Terminal Program at St. Louis Lambert International Airport (STL) located in St. Louis, Missouri. This document includes the agency determinations and approvals for those proposed Federal actions described in the Final Environmental Assessment and Section 4(f) Statement (Final EA) dated October 2024. This document discusses all alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Action Alternative and the No Action Alternative, which are evaluated in this FONSI and ROD. This document also identifies the environmentally preferred alternative and the agency preferred alternative. This document identifies applicable and required mitigation.

**BACKGROUND.** In December 2023, the FAA made a determination to prepare an EA through the St. Louis Airport Authority (STLAA). The EA addresses the potential environmental effects of the proposed project including various reasonable alternatives to that proposal. The EA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA)[Public Law 91-190, 42 USC 4321-4347], the implementing regulations of the Council on Environmental Quality (CEQ) [40 CFR Parts 1500-1508), and FAA Orders 1050.1F. *Environmental Impacts: Policies and Procedures* and 5050.4B, *National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions*. The STLAA published the Notice of Availability for the Draft EA and the Draft Section 4(f) Statement on July 3, 2024. A public open house was conducted on August 6, 2024. The FAA and STLAA received written comments on the Draft EA and Draft Section 4(f) Statement July 3, 2024 through August 16, 2024. The FAA approved the Final EA and Section 4(f) Statement on October 18, 2024.

**WHAT SHOULD YOU DO?** Read the FONSI and ROD to understand the actions that FAA intends to take relative to the proposed Consolidated Terminal Program at St. Louis Lambert International Airport.

**WHAT HAPPENS AFTER THIS?** The St. Louis Airport Authority may begin to implement the Proposed Action Alternative.

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**FINDING OF NO SIGNIFICANT IMPACT/RECORD OF DECISION**

**For the Proposed**

**CONSOLIDATED TERMINAL PROGRAM**

**ST. LOUIS LAMBERT INTERNATIONAL AIRPORT  
ST. LOUIS, ST. LOUIS COUNTY, MISSOURI**

**CEQ Unique ID: EAXX-021-12-ARP-1726844592**

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This Finding of No Significant Impact (FONSI) and Record of Decision (ROD) (FONSI/ROD) was prepared for the proposed Consolidated Terminal Program (CTP) at the St. Louis Lambert International Airport (STL) in St. Louis, Missouri. The St. Louis Airport Authority (STLAA) is responsible for the operation of STL. The Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) and other applicable statutes before taking any actions that are necessary prior to implementation of the project. NEPA requires that after preparing an Environmental Assessment (EA), federal agencies must decide whether to issue a FONSI and approve the proposed project or prepare an environmental impact statement prior to rendering a final decision on approval of a proposed project. The FAA has completed the EA, considered its analysis, and determined that no further environmental review is required. Therefore, the FAA is issuing the FONSI/ROD accompanied and supported by the FAA's Final EA and Section 4(f) Statement (Final EA), completing environmental review requirements for the project.

The attached Final EA, dated October 2024, was prepared in accordance with the guidelines and requirements set forth by NEPA, Council on Environmental Quality (CEQ) regulations, and FAA orders. Presented is a description of the Purpose and Need, the Proposed Action, Alternatives Considered, and Assessment and Mitigation as discussed in the attached Final EA with Federal Findings regarding the Proposed Action.

**PURPOSE AND NEED FOR THE PROPOSED ACTION:**

Chapter 1 of the Final EA describes the Purpose and Need. The STLAA identified deficiencies within the existing passenger terminals, roadways, and parking facilities at STL. These deficiencies are detailed in the 2023 STL Master Plan. The existing terminals lack

adequate passenger holdrooms, corridors, restrooms, concessions, security screening facilities, roadways, and parking. The Master Plan also identified inefficiencies, including duplication of services and excessive operating and maintenance costs associated with operating two terminal facilities, as well as lost revenue opportunities associated with parking and concessions.

The purpose of the Proposed Action is to enhance the passenger experience, increase airport revenue, eliminate duplication of services, eliminate aging and redundant building systems, and ensure continued safe, secure, and efficient operations at STL by providing sufficient space and facilities for current and forecast passenger demand and aircraft operations, as well as an improved access from the highway.

The need for this project is evidenced by current deficiencies within the existing terminals, roadways, and parking facilities which must be improved to enhance the passenger experience, enhance passenger processing efficiency, eliminate redundancy, increase airport revenue, and continue safe and efficient operations.

### **PROPOSED ACTION AND REQUESTED FEDERAL ACTIONS:**

The Proposed Action includes several individual development components that collectively comprise the Consolidated Terminal Program (CTP). The following CTP development is shown on the January 30, 2024 conditionally approved Airport Layout Plan (ALP) and is described in detail in Section 1.5 of the Final EA:

- Replace Terminals 1 and 2 with a single consolidated terminal centered on the location of the existing Terminal 1 with space for up to 62 gates including,
  - Reconfigure the check-in lobby (passenger processor) that incorporates the existing terminal domes,
  - Consolidate security screening centered between the check-in lobby and the concourse,
  - Incorporate Federal Inspection Service (customs) accessible to all carriers,
  - Provide a new baggage claim area on the lower level,
  - Provide a two-level passenger drop-off and pick-up curb with departures on the upper level and arrivals on the lower level; and
- Reconfigure the aircraft apron and taxilanes around the consolidated terminal to facilitate efficient aircraft operations,
- Construct a new parking garage and ground transportation center directly across from the terminal,
- Reconfigure the terminal access road to improve driver wayfinding and decision making in the terminal roadway system and airport access,
- Close Terminal 2 until a potential reuse of the building is identified.

The FAA will take the following actions to authorize implementation of the proposed projects:

- Unconditional approval of the Airport Layout Plan (ALP) to depict the proposed improvements pursuant to 49 USC §§ 40103(b) and 47107(a)(16).
- Determinations under 49 USC 47106 and 47107, relating to the eligibility of the Proposed Action for federal funding including but not limited to the Airport Improvement Program (AIP) and other Federal funding programs, and/or determinations under 49 USC 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFCs).
- Determination under 49 USC § 44502(b) that the airport development is reasonably necessary for use in air commerce or in the interests of national defense.
- Approval of changes to the airport certification manual pursuant to 14 CFR Part 139 (49 USC § 44706).

### **ALTERNATIVES CONSIDERED:**

Chapter 2 of the Final EA describes the alternative evaluation process. The STL Master Plan reviewed fifteen terminal plans and over fifty individual terminal alternatives to define the preferred terminal alternative. Two alternatives advanced for detailed environmental evaluation in the Final EA:

**Alternative 5-P1 (Proposed Action):** This alternative replaces the existing Terminals 1 and 2 with a single consolidated terminal centered on the location of the current Terminal 1 and closing Terminal 2. This alternative best meets the project's purpose and need to provide a better customer experience for passengers and ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand.

**The No Action Alternative:** Under the No Action Alternative, STL would maintain its existing infrastructure and terminal configuration, and would not address the current deficiencies within the existing terminals, roadways, access from the highway, and parking facilities. The No Action Alternative would continue operations as they are today. The No Action alternative does not meet the project's purpose and need. However, in addition to being a NEPA/CEQ requirement, it does serve as a baseline for a comparison of impacts to the preferred alternative and is therefore retained for analysis.

### **ASSESSMENT AND MITIGATION:**

The Final EA addresses the effect of the proposed project on the human and natural environment. Chapter 3 of the attached Final EA provides a detailed description of existing conditions and the environmental consequences of the Proposed Action on resources in accordance with FAA Orders 1050.1F and 5050.4B and analyzes the potential for significant impacts. Statements of consistency with community planning from state and local governments are highlighted in the Final EA.

The FAA has assessed the Proposed Action as the preferred alternative. The Final EA and associated correspondence were reviewed by the FAA to determine whether each of the affected resources exceeded an established threshold of significance. The FAA determined that the Final EA adequately described the potential impacts of the Proposed Action.

The Proposed Action will not change flight patterns, altitudes, or aircraft traffic volumes at the Airport. The STL's Proposed Action will not significantly affect environmental resources as discussed and analyzed in the attached Final EA.

The FAA examined the following environmental impact categories: Air Quality; Biological Resources; Climate; Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund (LWCF) Act, Section 6(f) Resources; Hazardous Materials, Solid Waste, and Pollution Prevention; Historic, Architectural, Archeological or Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Compatible Land Use; Socioeconomic, Environmental Justice, and Children's Environmental Health and Safety Risks; Surface Transportation Noise; Visual Effects; Water Resources; and Cumulative Impacts. The most important environmental issues related to the Proposed Action are detailed in Chapter 3 of the Final EA and summarized below.

Mitigation measures that would be a condition of FAA's approval of the Proposed Action are specifically identified below. STLAA should comply with any applicable Federal, state, or local requirements during implementation of the Proposed Action.

**Resources Not Affected:** As described in Section 3.2 of the Final EA, these resources were considered but not analyzed in detail because the resources do not occur in the study area. Based on the results of site visits and research, the No Action and Proposed Action would not have direct or indirect impacts on the following resources: Coastal Resources; Farmlands; and Wild and Scenic Rivers.

**Air Quality:** Section 3.5 of the Final EA. STL is located in St. Louis County, Missouri, an area designated by the EPA as maintenance for the 8-hour 2008 O<sub>3</sub> standard, moderate nonattainment for the 2015 O<sub>3</sub> standard, and attainment for all the other NAAQS. Emission inventories were prepared to disclose project-related emissions of all criteria air pollutants and precursor pollutants. None of the Proposed Action's emission levels exceed the *de minimis* thresholds; therefore, State Implementation Plan (SIP) conformity requirements are not applicable.

Neither the No Action Alternative nor the Proposed Action would result in significant air quality impacts and no mitigation is required. Construction activities associated with the Proposed Action would result in temporary emissions from construction equipment, trucks, and fugitive dust emissions from site demolition and earthwork. The impacts would occur only within the immediate vicinity of the construction sites and would be minimized through best management practices (BMP) to reduce emissions, particularly fugitive particle emissions, during construction.

**Biological Resources:** Section 3.6 of the Final EA. Lists of protected species of flora and fauna were analyzed. Although the Proposed Action is located in a highly developed area, suitable habitat (sixteen trees) for the federally listed Indiana Bat, Northern Long-Eared Bat, and the Tricolored Bat is present within the project area. The FAA determined, and the U.S. Fish and Wildlife service (USFWS) concurred, that the Proposed Action may affect, but is not likely to adversely affect the Indiana Bat, Northern Long-Eared Bat, and Tricolored Bat. Neither the No Action nor the Proposed Action would result in significant impacts to biological resources.

The project sponsor commits to clear the identified suitable bat roost trees during the inactive season, between November 1 and March 31. Since some structures may also provide habitat for listed bats, the sponsor will also inspect any structures that are open (such as the parking garage) or in poor condition and that may allow for bat roosting for the signs of bat presence prior to demolition.

Additionally, bird species protected by the Migratory Bird Treaty Act (MBTA) are not expected to be impacted by this project. Prior to tree removal and demolition of structures, including buildings, bridges, and/or culverts, nesting surveys would be conducted to avoid injury to eggs or nestlings.

**Climate:** Section 3.7 of the Final EA. Construction and operational emissions were prepared for the Proposed Action. Since there are no federal standards and the FAA does not have a threshold of significance for climate, emissions of greenhouse gases (GHG) are provided in Table 3.7-1 of the Final EA for disclosure purposes. In accordance with CEQ's GHG NEPA guidance, Table 3.7-2 of the Final EA presents the social cost associated with the construction and operation of the Proposed Action. Of note, GHG emissions are anticipated to decline after the implementation of the Proposed Action.

**Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund (LWCF) Act, Section 6(f) Resources:** Section 3.8 of the Final EA. The FAA determined that the existing Lambert Field Historic District (former Missouri Air National Guard Facility) is eligible for inclusion in the National Register of Historic Places (NRHP) and therefore, would be considered a Section 4(f) resource.

With the demolition of the NRHP-eligible Lambert Field Historic District, the FAA determined that the Proposed Action would constitute a physical "use" of the Section 4(f) resource. The FAA also determined that the Proposed Action would not result in a constructive use of any Section 4(f) resources.

Where an action would involve the use of a Section 4(f) property, Section 4(f) requires that prior to approving the action, the FAA must determine that there is no feasible or prudent alternative that would avoid the use of the Section 4(f) property and that the project includes all possible planning to minimize harm resulting from the use. As defined in 23 CFR §

774.17,<sup>1</sup> “all possible planning” means that all reasonable measures to minimize harm or mitigate adverse impacts must be included in the project. With regard to historic sites, this means the measures as agreed to by the FAA and the State Historic Preservation Officer (SHPO) in accordance with the consultation process under the regulations implementing Section 106 of the National Historic Preservation Act (NHPA). As the Proposed Action would involve a use, a separate Section 4(f) Statement was prepared.

The FAA determined that there are no alternatives that address the purpose and need of the project and are both prudent and feasible. The FAA consulted with the SHPO under Section 106 to develop a Memorandum of Agreement (MOA). The MOA outlines the mitigation measures needed to resolve adverse effects of the Proposed Action on the NRHP-eligible Lambert Field Historic District. Execution of the MOA and implementation of its terms would fulfill the Section 4(f) requirement that the project include all possible planning to minimize harm and reduce the effects of the use of the Section 4(f) resource below the threshold of significance. Execution of the MOA and implementation of its terms is a requirement of the Proposed Action. The U.S. Department of the Interior concurred with the FAA’s determination. Neither the No Action nor the Proposed Action would result in significant impacts to 4(f) resources.

The FAA prepared a Draft Section 4(f) Statement that was made available for public comment at the same time as the Draft EA. The Final 4(f) Statement is included in Appendix F of the Final EA.

**Hazardous Materials, Solid Waste, and Pollution Prevention:** Section 3.9 of the Final EA describes the impacts to this resource category.

Hazardous Materials:

The Proposed Action includes demolition of facilities in the existing terminal area, including the former Missouri Air National Guard (MoANG) Campus, the fuel consortium facilities (Swissport) and the removal and/or the relocation of existing fuel tanks. During the removal or relocation, it is possible that unknown fuel spills, hazardous soil, asbestos-containing materials (ACM) or lead-based paint (LBP) may be encountered. Additional surveying and testing would occur prior to demolition to ensure all hazardous materials are identified.

These materials are not considered to be uncommon and disposal practices exist to handle and dispose of these materials safely; therefore, no significant impact is anticipated. It would be the responsibility of STL to ensure that the contractor would arrange for the transportation and disposal of all hazardous materials that would be created from the demolition in accordance with all applicable regulations.

Under the Proposed Action, STL would continue to store and use aviation fuels in the reconstructed terminal area. STL would comply with federal, state, and local laws that control the use, generation, disposal, and monitoring of hazardous materials and would

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<sup>1</sup> These regulations, issued by the Federal Highway Administration, Federal Transit Administration, and Federal Railroad Administration, are not binding on the FAA but may be used as guidance to the extent relevant.



obtain and comply with applicable permits. Therefore, no significant impacts for the No Action nor the Proposed Action related to hazardous materials would be expected from construction and operation of the Proposed Action.

Solid Waste:

Neither the No Action Alternative nor the Proposed Action would result in significant solid waste impacts and no mitigation is required. The Sponsor would seek to recycle as much material as practicable, from the demolition of the existing facilities and existing pavement areas. Material that is not suitable for recycling would be disposed of using existing disposal measures, including sending solid waste to a permitted landfill.

Pollution Prevention:

The Proposed Action would result in a net increase of approximately six (6) acres of impervious surfaces. However, the Proposed Action includes various stormwater collection system improvements. A Construction Storm Water Pollution Prevention Plan (SWPPP) and a Land Disturbance Permit from the Missouri Department of Natural Resources (MDNR) would be required for construction of the Proposed Action. Best Management Practices (BMPs) would be implemented during construction to limit runoff and erosion and to avoid or minimize accidental spills or releases. No changes to Metropolitan Sewer District permitting requirements are anticipated.

The proposed stormwater and glycol collection facilities will be designed and permitted in coordination with federal, state, and local agencies, as required, and in accordance with the requirements of the National Pollution Discharge Elimination System (NPDES) permits issued by MDNR. STL would update its SWPPP and spill prevention, control, and countermeasures (SPCC) plan to reflect facility changes and maintain compliance with applicable regulatory requirements. Neither the No Action Alternative nor the Proposed Action would result in significant impacts.

**Historic, Architectural, Archeological or Cultural Resources:** Section 3.10 of the Final EA describe FAA's evaluation of the direct and indirect impacts from federal actions on historic, architectural, archaeological, and other cultural resources under Section 106, the principal statute concerning such resources. Section 106 requires federal agencies to take into account the effects of their undertakings on properties that are listed in or determined eligible for inclusion in the National Register of Historic Places (NRHP), and to consult with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officers (THPO), and other parties to develop and evaluate alternatives or modifications to the undertaking where necessary to avoid, minimize, or mitigate adverse effects on historic properties. The independent federal agency overseeing federal historic preservation and tribal programs, the Advisory Council on Historic Preservation (ACHP), must be afforded a reasonable opportunity to comment on such undertakings subject to Section 106.

The FAA, after review of the architectural and historic properties survey and input from the SHPO, determined that the Lambert Field Historic District as well as the Terminal Domes are eligible for the NRHP. The SHPO concurred with this determination. Under the Proposed Action, with the proposed demolition of the Lambert Field Historic District and construction

of the consolidated terminal with associated development, the undertaking would constitute an adverse effect to the Lambert Field Historic District. The SHPO concurred with this adverse effect determination.

The City of Bridgeton, City of Berkeley, City of Florissant, Florissant Valley History Society and St. Louis County Landmarks were contacted as potentially interested consulting parties, but they declined the invitation to consult on the undertaking.

Twelve (12) Tribes were invited to participate as consulting parties. The Osage Nation requested archaeological monitoring during construction. The Eastern Shawnee Tribe of Oklahoma responded that the proposed project will not adversely affect any known archeological, historical, or sacred sites and/or properties of cultural significance. Ten (10) tribes did not respond.

To mitigate the adverse effect to the Lambert Field Historic District, prevent any adverse effect on the Terminal Domes, and provide archaeological monitoring, the FAA, STL, the Osage Nation, and the SHPO, engaged in consultation and developed a Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act (NHPA). A copy of the MOA detailing the mitigation measures can be found in the Appendix of the Final EA.

The mitigation measures (stipulations) in the MOA include:

- A. Photographic Record
- B. Physical Display
- C. Website History
- D. Design Review
- E. Archaeological Monitoring

The mitigation measures of the MOA are a requirement of the Proposed Action. As stated in the MOA, execution of the MOA and implementation of its terms evidences that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

Although the Proposed Action will result in an adverse effect, mitigation measures in the MOA are intended to resolve adverse effects. Through implementation of these measures, impacts will be mitigated below the level of significance and therefore the Proposed Action would not result in a significant impact to this category of resources under NEPA.

**Land Use:** Section 3.11 of the Final EA. The existing land uses within the project study area are made up of developed land used for Airport operations and roadways. There are no residences, schools, churches, hospitals, publicly owned parks, recreational areas, or wildlife or waterfowl refuges within the project study area. The Proposed Action would occur entirely on STL property and within existing MoDOT right-of-way (ROW) and would not change the current land use designations in the project area. The Proposed Action would be compatible with existing and expected zoning and surrounding area land use plans.

The Sponsor Land Use Letter provided in the EA states that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including the landing and takeoff of aircraft. This applies to both existing and planned land uses. For these reasons, the Proposed Action would be compatible with existing and expected zoning and surrounding area land use plans. Neither the No Action nor the Proposed Action would result in significant land use impacts.

**Natural Resources and Energy Supply:** As evaluated in Section 3.12 of the Final EA, the Proposed Action would not consume a notable quantity of natural resources, nor would it exceed local supplies for fuel and energy. In addition, many of the proposed new facilities and utilities would replace older, less efficient facilities, which would achieve a reduction in energy use and potentially even water usage. Proposed construction activities would require the use of typical construction materials such as wood, metal, sand, gravel, concrete, dirt for fill material, glass, water, and asphalt. These materials are not in short supply in the St. Louis area and construction of the Proposed Action would not exceed the available supply of these materials. Therefore, neither the No Action nor the Proposed Action will have a significant impact on natural resources or the local energy supply.

**Noise and Compatible Land Use:** As described in Section 3.13 of the Final EA, a noise analysis was conducted on the impact of airport-related noise levels upon surrounding noise-sensitive land uses located within the noise contours for the No Action Alternative and the Proposed Action. The operational impact analysis was prepared for the year of anticipated project implementation (2032) and five years after implementation (2037).

The FAA uses 14 CFR Part 150, Airport Noise Compatibility Planning, land use compatibility guidelines to determine compatibility with most land uses. Generally, all land uses exposed to noise levels below the DNL 65 db noise contour are considered compatible. All the existing residences, public schools, nursing homes, hospitals, libraries, or religious institutions within the Existing Condition 65 DNL or higher contours have been previously mitigated as part of STL's Part 150 sound insulation program and are considered compatible.

As stated in Section 3.13, there are no new unmitigated residences, public schools, nursing homes, hospitals, libraries, or religious institutions within the Future 2032 and 2037 No Action Alternative contours. Additionally, there are no new unmitigated noise sensitive land uses within any of the Future 2032 and 2037 Proposed Action contours. Therefore, there are no new non-compatible land uses due to the Proposed Action.

No new noise sensitive land uses would be subject to noise levels of DNL 65 dB or greater due to an increase in noise of DNL 1.5dB or greater when compared to the No Action alternative for the same timeframe. Further, no existing noise sensitive land uses within the DNL 65 dB would be subject to an increase in noise of DNL 1.5 dB or greater. Therefore, no significant aircraft noise impacts would occur as a result of the Proposed Action.

**Socioeconomic, Environmental Justice, and Children's Environmental Health and Safety Risks:** Section 3.14 of the Final EA describes the impacts to this resource category.

#### Socioeconomic:

The Proposed Action would occur entirely on airport property or within existing MoDOT ROW. No residences or businesses would be relocated as a result of the project. No disruption or division of an established community would occur. The Proposed Action would result in changes in traffic patterns which are intended to improve the safety and increase efficiency of the airport access roadways. The planned roadway reconfigurations could have an adverse impact on the local economy and could alter the foot traffic to and from the neighboring communities trying to access the airport.

Access to the Airport would change for multiple businesses and residential neighborhoods located in the area of the Pear Tree Drive and Airflight Drive intersection. Traffic predicted for the Proposed Action decreases some turning movements along Pear Tree Drive when compared to the No Action while the overall traffic in the I-70 corridor adjacent to the Airport and adjacent to these businesses increases. Furthermore, the majority of the businesses in this area are airport user-based businesses, such as hotels, rental car facilities airport parking lots, gas stations and restaurants, which will continue to serve airport users under the Proposed Action.

The Proposed Action is expected to result in a short-term economic benefit due to the increase in employment in the construction sector proportionate to the construction projects. This increased employment would result in a boost to local merchants and could result in positive growth and a short-term increase in the community tax base. The induced economic and employment effects likely to result from the Proposed Action are positive and consistent with local plans. No substantial shifts in business or economic activity adversely impacting the local economy are expected. Therefore, while the Proposed Action would slightly alter travel time and distance and could be an adverse economic impact on Pear Tree Drive/Natural Bridge Road area businesses and residences, the impact is not anticipated to be significant as compared to the No Action alternative.

#### Environmental Justice:

Minority and low-income populations are present within the affected area. The Proposed Action would not increase air emissions beyond *de minimis* levels for any evaluated pollutant, nor would it create aviation noise impacts at or above 65 dB. While the roadway access improvements connected to the Proposed Action do not result in a substantial increase in noise for noise sensitive resources south of I-70 in the project area, noise generated by I-70 traffic does result in impacts for noise sensitive resources south of I-70 along the project area, requiring evaluation of noise abatement under FHWA rules. See additional discussion below under **Surface Transportation Noise**. No significant impacts are anticipated for other resources evaluated. Therefore, the focus for evaluating potential disproportionately high and adverse impacts to populations of EJ concern was for areas that would experience a change in traffic patterns.

The existing airport entrance is located within a community that is identified as a low-income and minority population and is used by the surrounding community. The Proposed Action would move the main entrance to the Airport diverting traffic away from the existing Airfield

Drive intersection and limiting the amount of foot traffic which could affect the economy in the area for business and residential neighborhoods located near the Pear Tree Drive and Airflight Drive intersection. The Proposed Action would slightly alter the travel time and distance and could be an adverse economic impact on Pear Tree Drive/Natural Bridge Road area businesses and residences. However, the impact is not anticipated to be significant as compared to the No Action alternative. Since the affected area includes EJ populations in all but 3 census tracts within the entire affected community, disproportionate effects would not be expected. Therefore, the Proposed Action would not be expected to cause disproportionate high and adverse human health or environmental effects on minority or low-income populations.

Children's Environmental Health and Safety Risks:

The Proposed Action would not result in an elevated risk related to health or safety concerns for children within the affected community. Air quality and release of soil or groundwater contamination are the primary children's health concerns. As indicated previously, the air quality analysis indicated no increase in air emissions beyond *de minimis* levels under the Proposed Action and would not result in the release of soil or groundwater contaminants. Therefore, there would be no adverse effects on children's health and safety under the Proposed Action.

Recognizing the economic impact the Airport has on the surrounding communities and region, STL will continue collaborating with stakeholders for continued input during landside access improvement design efforts.

**Surface Transportation Noise:** As described in Section 4.8 of the Final EA, a noise analysis using the Traffic Noise Model (TNM) for surface transportation was completed for proposed improvements within the I-70 right-of-way (ROW). I-70 is the primary traffic noise source in the traffic noise study area.

Existing sound levels exceeding the Noise Abatement Criteria (NAC) do not constitute an impact under Federal Highway Administration (FHWA) regulations and Missouri Department of Transportation (MoDOT) policies. FHWA considers only the future build condition when determining traffic noise impacts.

Modeling of the Proposed Action's future build traffic noise indicates the Pear Tree Apartments will experience traffic noise impacts approaching, meeting, or exceeding the NAC. FHWA requires abatement measures to be considered, but only requires implementation if the abatement measures are found to be both feasible and reasonable as defined by the regulations.

A noise abatement barrier for the Pear Tree Apartments is projected to provide at least 7 dB(A) of noise reduction for all first-row, first-floor receptors in accordance with Missouri's Noise Reduction Design Goal. As a result, this barrier meets the preliminary feasibility and reasonableness requirements of MoDOT's Engineering Policy Guide.

However, roadway design has not advanced sufficiently to perform surface noise public involvement, which is the remaining reasonableness requirement under MoDOT's policy. The final decision on the implementation of noise barriers will be made by MoDOT during project design. When design is advanced sufficiently, MoDOT will solicit the viewpoints of those benefitted by the noise barrier as part of the evaluation of reasonableness. If desired by the public and constructed, the recommended noise barrier along the limited access right of way is expected to mitigate traffic noise to the standards required by MoDOT and FHWA. Only barriers determined to be both reasonable and feasible will be constructed.

**Visual Effects:** Section 3.15 of the Final EA describes the analysis of the potential visual effects (i.e., light emissions and visual character).

**Light Emissions:** It is anticipated that the Proposed Action would have the same basic types of lighting currently used on the airport. Therefore, lighting from the Proposed Action when compared to the No Action Alternative would not significantly increase the overall light emissions due to their type, intensity, and distance from residential areas.

**Visual Character:** The design of the proposed new terminal building is anticipated to be relatively low profile as to not obstruct the view from the existing Air Traffic Control Tower (ATCT). Since the proposed terminal building would be designed so as to not obstruct the view from the ATCT, the Proposed Action would not include any significant vertical development compared to the No Action Alternative. Additionally, the Proposed Action will avoid adverse effects on the terminal building's domes. The views of the domes from off-Airport would be similar to the existing views. Therefore, no noticeable change to the visual resources and visual character would occur that would significantly alter, contrast, or obstruct the existing views from residential areas due to the distance and the obstacles in the way.

For these reasons, neither the No Action nor the Proposed Action would result in significant impacts to either light emissions or visual character.

**Water Resources:**

**Wetlands:** As discussed in detail in Section 3.16 of the Final EA, the project study area was investigated for the presence of wetlands and regulated surface water resources. One wetland and eight streams were identified within the study area: Coldwater Creek, and seven unnamed tributaries to Coldwater Creek. Coordination with the U.S. Corps of Engineers (USACE) determined that Coldwater Creek and four (4) streams are jurisdictional while three (3) streams and the one (1) wetland are non-jurisdictional. The Proposed Action may impact up to 0.01 acre of wetland and 4,018-feet of streams. Impacts are primarily associated with construction of the Consolidated Terminal, road infrastructure improvements, placement of fill for installation of culverts, as well as channel improvements and bank stabilization along impacted streams.

There is no practicable alternative to construction in wetlands. The Proposed Action includes all practicable measures to minimize harm to wetlands which may result from such construction. The full extent of the impacts will be determined during the design and permitting phase of the project. A Section 404 permit from the USACE will be necessary to

comply with the Clean Water Act for proposed impacts to waters of the U.S. It is anticipated that the project would require a Section 404 Individual Permit due to the length of potential stream impacts as well as an individual 401 Water Quality Certification. It is anticipated that impacts could be offset through the purchase of credits at a USACE approved mitigation bank or as part of an In Lieu Fee (ILF) Mitigation Program.

Floodplains: As discussed in detail in Section 3.17 of the Final EA, the Missouri State Emergency Management Agency (SEMA), in cooperation with the Federal Emergency Management Agency (FEMA), is currently in the process of updating the floodplain maps. The revised floodplain maps in the vicinity of the Airport are anticipated to become effective in 2024. Based on these new floodplain limits, approximately 39 acres of the project study limits are located within the 100-year floodplain and approximately 55 acres are within the 500-year floodplain.

Under the Proposed Action, up to 3 acres of encroachment, associated with enclosing a portion of Coldwater Creek, would occur within the new 100-year floodplain and up to 5 acres of encroachment would occur within the 500-year floodplain. The proposed Consolidated Terminal, including all new structures, would be located outside of the new 100-year and 500-year floodplain limits. The proposed section of Coldwater Creek to be enclosed and any proposed fill in the floodplain proposed as part of the Proposed Action will require compensatory excavation within the floodplain to avoid a rise in the base flood elevation.

There is no practicable alternative to avoiding development in the floodplain and all practical measures to minimize harm will be included in the project. The action conforms to applicable state and/or local floodplain protection standards. The Proposed Action would not have a significant adverse impact on floodplains.

The Proposed Action would require a floodplain development permit associated with the proposed Coldwater Creek enclosure, from the St. Louis County floodplain administrator. Since the airport is also located within the Metropolitan St. Louis Sewer District (MSD) service boundaries, alteration of any storm drainage channels, site drainage or floodplain encroachments would need to be designed and approved by the MSD.

Surface and Ground Water: As discussed in Sections 3.18 and 3.19 of the Final EA, the Airport currently controls stormwater pollution in accordance with its Missouri State Operating Permit. This permit contains specific operational and facility management actions to prevent and control the potential for discharge of pollutants into surface and groundwater within existing operational areas of the airport. MoDOT manages stormwater runoff through its Transportation Separate Storm Sewer System (TS4) Permit issued by MDNR.

The Proposed Action would result in a net increase of approximately six (6) acres of impervious surfaces. The proposed stormwater infrastructure improvements included in the Proposed Action will be designed in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Permits. Post-construction BMPs would

also be implemented to address stormwater runoff from the project within MoDOT right-of-way in accordance with the TS4 Permit, as required. Neither the No Action nor the Proposed Action would result in significant impacts to surface and ground waters.

STL should use best management practices to minimize impacts to water quality during construction. Since construction activities will disturb more than 1 acre, a NPDES permit would be required from MDNR prior to construction.

**Cumulative Impacts:** The past, present, and reasonably foreseeable future actions were evaluated for cumulative impacts from these actions that could result in environmental impacts from implementation of the Proposed Action.

With implementation of the Proposed Action, the level of cumulative impacts anticipated to occur within these environmental resource categories is not significant due to: the types of past, present, and reasonably foreseeable future projects; the extent of the built environment in which they would occur; the lack of certain environmental resources in the area; and the mitigation measures identified for the Proposed Action. Therefore, as stated in Section 3.20 of the Final EA, implementation of the Proposed Action would not result in significant cumulative environmental impacts.

**FAA and MoDOT/FHWA Environmental Mitigation and Commitments:**

Chapter 3, Table 3.21-1 summarizes the environmental impacts associated with the implementation of the Proposed Action compared with the No Action Alternative on the resources analyzed in the Final EA and identifies proposed environmental mitigation to be implemented, as required, as a condition of FAA's approval of the Proposed Action.

The Proposed Action will also impact the ROW controlled by MoDOT. Since FHWA is a cooperating agency under NEPA, Chapter 4 of the Final EA summarizes the environmental impacts of the Proposed Action on the ROW along with proposed environmental commitments applicable within the existing ROW. Although these proposed commitments are a condition of FAA's approval of the Proposed Action, these commitments are also subject to approval by MoDOT/FHWA in accordance with FHWA NEPA requirements.

**ENVIRONMENTALLY PREFERRED ALTERNATIVE AND FAA PREFERRED ALTERNATIVE:**

Based on the analysis of environmental impact in the Final EA, the No Action Alternative has fewer environmental effects than the Proposed Action Alternative and thus would be the environmentally preferred alternative. In addition to identifying the environmentally preferred alternative, the FAA also identifies the FAA preferred alternative. In selecting the agency's preferred alternative, the FAA considers a variety of factors, including the ability of the alternatives to satisfy the Purpose and Need of the project as well as environmental impacts of the alternatives examined in the EA. Although the No Action Alternative entails fewer environmental impacts, the Proposed Action Alternative incorporates design elements and construction practices to reduce environmental impacts. Furthermore, after mitigation,



there are no significant impacts associated with the Proposed Action Alternative. Finally, the Proposed Action Alternative fully satisfies the Purpose and Need for the project. Because the No Action Alternative does not meet the Purpose and Need for the proposed project, and because the Proposed Action Alternative is designed to minimize environmental effects, the FAA's preferred alternative is the Proposed Action Alternative.

### **AGENCY COORDINATION AND PUBLIC OUTREACH:**

**Agency and Public Scoping:** Section 5.2 of the Final EA discusses the agency and public scoping for the environmental assessment. On December 15, 2022, a governmental agency meeting and a public scoping meeting were completed to determine the range of issues to be analyzed and to what magnitude they were to be treated. Key governmental agencies were invited to attend the virtual Agency Scoping Meeting and to provide any information they wished to be considered in the EA. 17 representatives of state and local agencies participated in the agency scoping meeting.

In addition to the agency scoping meeting, a public scoping meeting was held that same day to introduce the environmental review process and solicit feedback on issues or concerns to be evaluated during the NEPA processes. Several methods were used to notify the public of the public scoping meeting. Postcards announcing the meeting date, time, location and purpose were mailed to 14,110 residences and businesses within a one-mile radius of the airport. Email invitations were sent to 49 project stakeholders who were part of the Airport's Master Planning process and to 101 individuals who registered for updates. Airport officials placed six (6) social media posts and advertised on their FlySTL website. Both a media advisory and press release were distributed to local media outlets.

A more detailed discussion of agency and public scoping is included in Chapter 5 of the Final EA. A copy of the agency and public scoping meeting notices, lists of attendees, materials presented at the meetings, and comments received during the scoping process are provided in Appendix A of the Final EA.

**Public Comment Period and Public Open House:** A 30-day Notice of Availability (NOA) announcing the availability of the Draft EA and Public Open House was published in the St. Louis Post Dispatch, a newspaper of general circulation.

The draft document was made available to the public for review online on the FlySTL website at <http://www.flystl.com/civil-rights/public-notice-and-reports>. In addition, paper copies of the Draft EA were available for public review at three local libraries, the STL Aviation Department, and the FAA Regional Office. The Draft EA was also sent to governmental agencies and communities in and adjacent to the project study area. The comment period for the draft EA was open from July 3, 2024 to August 16, 2024. More information can be found in Chapter 5 of the Final EA.

An open house was conducted on August 6, 2024 to offer the public the opportunity to learn more about the project, ask questions, and provide comments on the information contained in

the Draft EA. A copy of the workshop and hearing newspaper notices, lists of attendees, and materials presented are provided in Appendix A of the Final EA.

All comments received and the responses to the comments on the Draft EA are found in Appendix A of the Final EA. FAA did not receive any comments specifically on the Draft Section 4(f) Statement or the Draft Section 106 Memorandum of Agreement (MOA).

### **INTER-AGENCY COORDINATION:**

In accordance with 49 USC§ 47101 (h), the FAA has determined that no further coordination with the U.S. Department of Interior or the U.S. Environmental Protection Agency is necessary because the Proposed Action does not involve construction of a new airport, new runway or major runway extension that has a significant impact on natural resources including fish and wildlife; natural, scenic, and recreational assets; water and air quality; or another factor affecting the environment.

### **REASONS FOR DETERMINATION THAT THE PROPOSED ACTION ALTERNATIVE WILL HAVE NO SIGNIFICANT IMPACTS:**

The Final EA examines each of the various environmental resources that were deemed present at the project location or had the potential to be impacted by the Proposed Action. As described within this FONSI and in the Final EA, the proposed consolidated terminal program at STL would not involve any environmental impacts, after mitigation, that would exceed a threshold of significance as defined by FAA Orders 1050.1F and 5050.4B. The mitigation necessary to support a finding of no significant impact is contained in the Memorandum of Agreement (MOA) executed by FAA, STLAA<sup>2</sup>, the SHPO, and The Osage Nation to address adverse effects to the Lambert Field Historic District. The MOA is located in Appendix G of the Final EA.

### **AGENCY FINDINGS:**

The FAA makes the following determinations for this project based on information and analysis set forth in the Final EA and other portions of the project/administrative file.

- **The project is reasonably consistent with existing plans of public agencies for development of the area [49 U.S.C. 47106(a)].** The FAA is satisfied that the Proposed Action is reasonably consistent with the plans, goals, and policies for the area surrounding the airport based on coordination efforts with public agencies as described in Chapter 5 of the Final EA. The Proposed Action is also consistent with the applicable regulations and policies of federal, State, and local agencies.

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<sup>2</sup>STLAA's signature on the MOA reflects its agreement and commitment to implement the terms of the MOA. Execution of the MOA and implementation of its terms is a requirement of the Proposed Action.

- **Independent and Objective Evaluation.** As required by the Council on Environmental Quality (40 CFR § 1506.5), the FAA has independently and objectively evaluated this proposed project. As described in the Final EA, the Proposed Action and the No Action Alternative were studied extensively to determine the potential impacts and appropriate mitigation for those impacts. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the project.
- **Community Interests Considered [49 U.S.C. 47106(b)(2)].** The FAA is satisfied that the interests of the communities in or near where the project may be located were given fair consideration. The planning process for the Proposed Action is described in Chapter 2 of the Final EA. Nearby communities and their residents have had the opportunity to express their views during the scoping process, during the Draft EA and the Draft Section 4(f) Statement public comment periods, and at a public open house. The consideration of those views is included in Appendix A of the Final EA.
- **Land Use Restrictions [49 U.S.C. § 47107].** The FAA has received satisfactory assurances from the airport sponsor, included in Appendix H of the Final EA, that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with airport normal operations, including landing and takeoff of aircraft.
- **National Historic Preservation Act, Section 106.** The FAA has determined, and the SHPO has concurred, that the Lambert Field Historic District and Terminal Domes are eligible for the National Register of Historic Places. With the proposed demolition of the historic district and construction of a new terminal building with associated development, the undertaking (Proposed Action) would constitute an adverse effect to the historic district. FAA conducted the required consultation with the SHPO and other parties pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. FAA also afforded ACHP a reasonable opportunity to comment on the undertaking. A Memorandum of Agreement (MOA) was executed by the FAA, STLAA, SHPO, and The Osage Nation and is included in Appendix G of the Final EA. The MOA describes the measures needed to mitigate the adverse effect of the Proposed Action on the historic district. Execution of the MOA and implementation of its terms evidences that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment. STLAA's adherence to the stipulations in the MOA is a condition of approval of this FONSI/ROD.
- **Department of Transportation Act, Section 4(f) [49 U.S.C. § 303].** The Proposed Action would result in a physical "use" of the National Register-eligible Lambert Field Historic District, which is a Section 4(f) resource. FAA has determined that there are no alternatives that address the Purpose and Need of the project and are both

prudent and feasible. A MOA outlines the mitigation measures needed to resolve the adverse effects of the Proposed Action on the historic district. The mitigation measures in the MOA are a condition of approval of this FONSI/ROD and address the Section 4(f) requirement that the project include all possible planning to minimize harm to the historic district resulting from the use.

- **Avoidance and Minimization.** Based on the information contained in the Final EA, the FAA has determined that all practicable means to avoid or minimize environmental harm from the Proposed Action have been adopted. The proposed Action avoids and minimizes environmental harm in a variety of ways, including: reducing air quality emissions and GHG emissions along with energy and water usage after project construction is complete; recycling as much material as practicable; following all state and local regulations, as well as best management practices during construction activities relating to hazardous materials, solid waste, pollution prevention, fugitive dust, and storm water impacts; and other examples provided throughout the Final EA. Additionally, as stated above, the MOA documents that all practicable means to avoid or minimize adverse effects to the historic district, as well as minimize harm due to the use of the historic district, have been adopted.

### **DECISION AND ORDER:**

Based on the information in this FONSI/ROD and supported by detailed discussion in the Final EA, the Proposed Action has been identified as the FAA's selected alternative and the FAA must either:

- Approve agency actions necessary to implement the Proposed Action, or
- Disapprove agency actions to implement the Proposed Action.

Approval signifies that applicable federal requirements relating to the proposed airport development have been met. Approval permits STLAA to proceed with implementation of the Proposed Action and associated mitigation measures. Disapproval would prevent STLAA from implementing the Proposed Action elements within STL.

Under the authority delegated to me by the Administrator of the Federal Aviation Administration, I find that the project is reasonably supported. I, therefore, direct that action be taken to carry out the agency actions discussed more fully in the "PROPOSED ACTION AND REQUESTED FEDERAL ACTIONS" section of this FONSI/ROD.

This order is issued under applicable statutory authorities, including 49 U.S.C. §§ 40101(d), 40103(b), 40113(a), 44701, 44706, 44718(b), and 47101 et seq.

### **APPROVING FAA OFFICIAL'S STATEMENT OF ENVIRONMENTAL FINDING:**

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies

and objectives as set forth in Section 101 of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA is issuing this FONSI and will not prepare an Environmental Impact Statement (EIS) for this action.

**RODNEY N JOEL**

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JOEL

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APPROVED:

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Director, Airports Division  
FAA Central Region

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Date

DISAPPROVED:

\_\_\_\_\_  
Director, Airports Division  
FAA Central Region

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Date

**DEBRA G  
SANNING**

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Date: 2024.10.21 08:58:06 -05'00'

CONCUR:

\_\_\_\_\_  
Regional Administrator  
FAA Central Region

\_\_\_\_\_  
Date

***RIGHT OF APPEAL:***

*This decision document (FONSI/ROD) is a final order of the FAA Administrator and is subject to exclusive judicial review under 49 U.S.C. § 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision lives or has a principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.*