Appendix B

AGENCY LETTERS: CONCURRENCE, CERTIFICATIONS, CORRESPONDENCE

This appendix contains copies of the pertinent correspondence regarding the EIS process, analysis, findings, and the FAA's determinations.

The letters are provided in sequential order by date from 2004 when the EIS data collection was initiated through 2008 and the FAA's selection of a preferred alternative.

2003	
December 12	Letter from Tom Jargiello, Director of Aviation, Broward County Aviation Department, Fort Lauderdale-Hollywood International Airport, to Dean Stringer, Manager, FAA Orlando Airports District Office. This letter pertains to the approved motions of the Broward County Board of County Commissioners. Dated: December 12, 2003.
2004	
November 1	Letter from Tom Jargiello, Director of Aviation, Broward County Aviation Department, Fort Lauderdale-Hollywood International Airport, to Dean Stringer, Manager, FAA Orlando Airports District Office. This letter pertains to the Broward County Board of County Commissioners Goals and Objectives. Dated: November 1, 2004.
2005	
December 28	Letter from Frederick P. Gaske, Director, and State Historic Preservation Officer, to John Whitaker, Janus Research, RE: DHR Project File No. 2005-12090. Dated: December 28, 2005.
2006	
August 24	Memorandum from Max Wolfe/Eric Bernhardt, Leigh Fisher Associates (now Jacobs Consultancy), to Virginia Lane, AICP, Environmental Specialist, Federal Aviation Administration. Subject: Sponsor's Proposed Project Operational Assumptions. Dated: August 22, 2006/Revised: August 24, 2006.
December 12	Letter from Gil MacAdam, Broward County Parks and Recreation Division, to Virginia Lane, FAA Orlando Airports District Office, RE: Proposed Temporary Installation of Pipe/West Lake Park. Dated: December 12, 2006.

2007	***(continued)***
May 17	Letter from Paul Weller for Miles M. Croom, Assistant Regional Administrator, Habitat Conservation Division, National Marine Fisheries Service, to Virginia Lane, FAA Orlando Airports District Office, RE: F/SER4:JK/pw. Dated: May 17, 2007.
July 17	Letter from Frederick P. Gaske, Director, and State Historic Preservation Officer, to Virginia Lane, FAA Orlando Airports District Office, RE: DHR Project File No. 2007-2396-B & 2007-2527-B. Dated: July 17, 2007.
August 10	Letter from Josephus Eggelletion, Mayor Broward County Florida, to Bart Vernace, Assistant Manager, FAA Orlando Airports District Office, RE: Broward County (Sponsor) Preferred Runway Alternative. Dated: August 10, 2007.
November 9	Letter from Kent G. George, A.A.E., Director of Aviation, Broward County Aviation Department, to Virginia Lane, FAA Orlando Airports District Office, Subject: Broward County Proposed Noise Mitigation Principles. Dated: November 9, 2007.
December 4	Letter from Marc Gambrill, Acting Director, Planning and Development Aviation, Broward County Aviation Department, to Virginia Lane, FAA Orlando Airports District Office, RE: Use of Wetland Mitigation Credits at West Lake Park for Airport Sponsors Proposed Project at Fort Lauderdale-Hollywood International Airport Broward County, Florida. Dated: December 4, 2007.
December 7	Letter from Kent G. George, A.A.E., Director of Aviation, Broward County Aviation Department, Fort Lauderdale-Hollywood International Airport, to Dean Stringer, Manager, FAA Orlando Airports District Office. RE: This letter pertains to Alternative D2 and Broward County's comments on the tenant relocation, future tenant expansion capabilities, and future aviation development growth. Dated: December 7, 2007.
2008	
January 31	Letter from Paul Souza, Field Supervisor, South Florida Ecological Services Office, U.S. Fish and Wildlife Services, South Florida Ecological Services Office, to Virginia Lane, FAA Orlando Airports District Office, RE: Service Federal Activity Code: 41420-2007-FA-0701. Dated: January 31, 2008.
February 5	Letter from Virginia Lane, FAA Orlando Airports District Office, to Jocelyn Karazsia, National Marine Fisheries Service, with enclosure *Direct, Secondary, and Cumulative Effects on Essential Fish Habitat*. Dated: February 5, 2008.
March 6	Letter from Tori K. White, Chief, Palm Beach Gardens Permits Section, U.S. Army Corps of Engineers, to Virginia Lane, FAA Orlando Airports District Office, RE: SAJ-1995-4561. Dated: March 6, 2008.

2008	***(continued)***
March 24	Letter from Roy E. Crabtree, Ph.D., Regional Administrator, National Marine Fisheries Service, to Virginia Lane, FAA Orlando Airports District Office, RE: File: 1514-22.f.1.FL, Ref: I/SER/2008/00504. Dated: March 24, 2008.
July 25	Letter from Heinz J. Mueller, Chief, NEPA Program Office, Office of Policy and Management, U.S. Environmental Protection Agency, Region 4, to Virginia Lane, FAA Orlando Airports District Office, RE: EPA NEPA Comments on FAA's FEIS, CEQ #20080244; ERP #FAA-E51052-FL. Dated: July 25, 2008.
July 25	Letter from Paul Weller for Miles M. Croom, Assistant Regional Administrator, Habitat Conservation Division, National Marine Fisheries Service, to Virginia Lane, FAA Orlando Airports District Office, RE: F/SER4:JK/pw. Dated: July 25, 2008.
July 28	Letter from Sally B. Mann, Director, Office of Intergovernmental Programs, Florida Department of Environmental Projection, to Virginia Lane, FAA Orlando Airports District Office, RE: SAI# FL200806204295C Reference SAI# FL200703223172C. Dated: July 28, 2008.
September 29	Letter from Virginia Lane, FAA Orlando Airports District Office, to Jocelyn Karazsia, National Marine Fisheries Service, with enclosure *Direct, Secondary, and Cumulative Effects on Essential Fish Habitat*. Dated: September 29, 2008.
September 31	Letter from Kent G. George, A.A.E., Director of Aviation, Broward County Aviation Department, Fort Lauderdale-Hollywood International Airport, to Dean Stringer, Manager, FAA Orlando Airports District Office, RE: Sponsor's Certification in Accordance with 49 U.S.C. 47106(c)(1)(a)(i), (ii), (iii); and Certification in Accordance with 49 U.S.C. 47107(a)(10). Dated: September 31, 2008.
November 25	Email from Pace Wilbur, Atlantic Branch Chief, Charleston (F/SER47) Southeast Regional Office, NOAA Fisheries, to Virginia Lane, FAA Orlando Airports District Office. Dated: November 25, 2008.
December 12	Letter from Kent G. George, A.A.E., Director of Aviation, Broward County Aviation Department, Fort Lauderdale-Hollywood International Airport, to Bart Vernace, Assistant Manager, FAA Orlando Airports District Office, RE: Broward County's Mitigation of the Environmental Impacts Resulting from Runway Expansion in Accordance with the Conditions of the Record of Decision. Dated December 12, 2008

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BROWARD COUNTY FLORIDA
AVIATION DEPARTMENT • Fort Lauderdale/Hollywood International Airport
320 Terminal Drive • Fort Lauderdale, Florida 33315 • 954-359-6100

December 12, 2003

Mr. W. Dean Stringer
Manager
Orlando Airports District Office
5950 Hazeltine National Drive
Suite 400
Orlando, Florida 32822-5024

Re: Broward County Board of County Commissioners' decision on December 9, 2003 regarding the runway alternatives at Fort Lauderdale-Hollywood International Airport

Dear Mr. Stringer:

Attached please find the motions approved by the Broward County Board of County Commissioners on December 9, 2003. If you have any questions regarding the attached, please do not hesitate to contact me.

Sincerely,

Tom Jargiello
Acting Director of Aviation

Attachment

Cc: Kathleen Camp, Deputy Aviation Director
Diana D. Lewis, A.A.E., Director of Planning & Development
Gary M. Sypek, Airport Planning Manager
Barbara Hill, Assistant County Attorney

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Ben Graber • Sue Gunzburger • [illegible] • John E. Rodstrom, Jr. • Jim Scott • Diane Wasserman-Rubin

SPECIAL PUBLIC HEARING OF DECEMBER 9, 2003

Motion 1. Approved 7 - 2.

Approved a modified south runway expansion which stays within the confines of Northeast 7th Avenue using value-added engineering to arrive at the most effective runway length with use restrictions. This alternative is to developed consistent with the following guidelines:

A. Continue with the Environmental Impact Statement process to include flight tracking along I-595 and other restrictions including other curfews.

B. Commence a process to engage a qualified firm to complete preliminary engineering, including evaluation of alternatives, designed to maximize the utility and acceptability of the runway alternative selected.

C. Work with the Federal Aviation Administration through the EIS process to provide a detailed, enforceable program that ensures the runway will be operated in a fashion that improves upon the noise mitigation benefits already incorporated in the County's various Interlocal Agreements and Development Orders.

D. Amend the Airport Layout Plan to reflect the runway alternative selected and to add "no runway alternatives should expand east beyond NE 7th Avenue."

E. Provide for noise mitigation in excess of minimum requirements.

F. Utilize airport funds and PFC's for advanced noise mitigation.

G. Evaluate options for shortening Runway 13-31, such that the results of this work can be included in the Environmental Impact Statement, if appropriate.

H. Develop new options for review by the Board of County Commissioners that would foster land use compatibility between Fort Lauderdale-Hollywood International Airport and surrounding communities so that the County's policies will be included in mitigation proposals in the Environmental Impact Statement. Additionally, staff was directed to work with the cities to ensure land use compatability for residential development.

I. Prepare a financial plan for review by the Board of County Commissioners that would expeditiously establish a Noise Mitigation Bank. Also staff was directed to contact the airlines with respect to the per passenger charges and gate fees to fund noise mitigation in the 60 to 65 DNL. Research the feasibility of the County building affordable replacement housing and funding same.

J. Develop conceptual plans for noise abatement flight tracks for arriving and departing aircraft to be reviewed by the Board of County Commissioners and discussed with the Federal Aviation Administration.

K. Commence a process to engage a qualified appraisal firm to evaluate acquisition of properties in the runway protection zone.

L. Commence the process of updating the Airport Master Plan to include concepts that decommission the crosswind runway, and define a framework for managing aircraft operational demand and growth through planned facility development. Additionally, staff shall examine mechanisms for limiting future arrival through infrastructure development, the number and location of gates and other means, including the review of the westside land use Master Plan. Further, the Board directed staff to evaluate a North Parallel runway, while preferring the South runway.

Motion 2. Approved 5 - 4

A. Follow a competitive bid process for the implementation of a Green Airport Initiative.

NOV 0 4 2004

BROWARD COUNTY FLORIDA

AVIATION DEPARTMENT - Fort Lauderdale/Hollywood International Airport
320 Terminal Drive • Fort Lauderdale, Florida 33315 • 954-359-6100

November 1, 2004

Mr. Dean Stringer
Manager, Orlando Airports District Office
Federal Aviation Administration
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

Dear Mr. Stringer:

This responds to your letter dated December 24, 2003 requesting information necessary for the preparation of the revised Environmental Impact Statement (EIS) for the proposed extension of Runway 9R/27L at the Fort Lauderdale-Hollywood International Airport. The following information is provided:

1) On October 26, 2004, the Board of County Commissioners (BOCC) approved and authorized the transmittal of an Airport Layout Plan (copy attached) depicting the "footprint" of the proposed extension within the confines of the Dania Cut-off Canal on the west and NE 7th Avenue on the east. URS completed a value engineering study (copy attached) which determined the maximum usable proposed lengths.

2) A user's meeting was held on April 28, 2004 with the airlines and air traffic control to secure their comments. No negative comments have been received to date from the operating airlines or FLL Air Traffic Control Tower.

3) The County's proposed project for evaluation in the EIS is the extension of Runway 9L/27R as depicted on the attached ALP. On October 26, 2004, the BOCC adopted the following "County's Airfield Development Program Objective Statement" for the FAA's use in developing the Purpose & Need:

"The purpose of the proposed airfield improvements is to simultaneously achieve the following to the maximum extent practical:

- enhance FLL's capacity to accommodate forecast traffic through the year 2020 in a manner that will maintain average annual aircraft delay at or below the 6 to 10 minute average annual delay range,

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Ben Graber • Sue Gunzburger • Kristin D. Jacobs • Ilene Lieberman • Lori Nance Parrish • John E. Rodstrom, Jr. • Jim Scott • Diana Wasserman-Rubin
www.fll.net

- decommission the use of Runway 13/31 (crosswind); and, in the interim, avoid using Runway 13/31 to address forecast increases in aircraft delays given Runway 13/31's operational inefficiencies and the higher levels of residential noise exposure associated with its use,

- mitigate noise exposure attributable to proposed improvements by implementing a runway use plan and residential noise mitigation processes contained in approved Interlocal agreements and development orders with and from nearby cities in an environmentally sensitive manner while preserving the airport's vital economic role, and

- implement residential noise mitigation initiatives in areas not currently eligible under the Airport Improvement Program to deal with the overall forecast growth in aircraft operations, including implementing mitigation in advance of the onset of noise exposure in residential areas forecast to be newly exposed to the highest levels of cumulative aircraft noise resulting from changes in the configuration of the airport, while preserving neighborhoods and providing affordable housing."

4) The Airport's critical aircraft to be used in preparation of the revised EIS is the Boeing 767-400. This aircraft was selected in accordance with the guidance provided in AC-150/5325-4A, "Runway Length Requirements for Airport Design", given the aircraft's performance criteria, operating weights, airport temperature, and demanding Design Group IV characteristics. During CY 2003, there were approximately 1,770 total operations and this usage is expected to continue.

5) A list of proposed projects underway and planned on and off airport and in the vicinity is attached. This list includes federal, state, and local projects.

6) The Aviation Department is currently advertising a Request for Letters of Interest (RLI) for the preparation of a Part 150/Noise Compatibility Program study. This study will include an environs plan component and is expected to be underway in March 2005 with completion expected in 12 months of an issuance of a "Notice to Proceed".

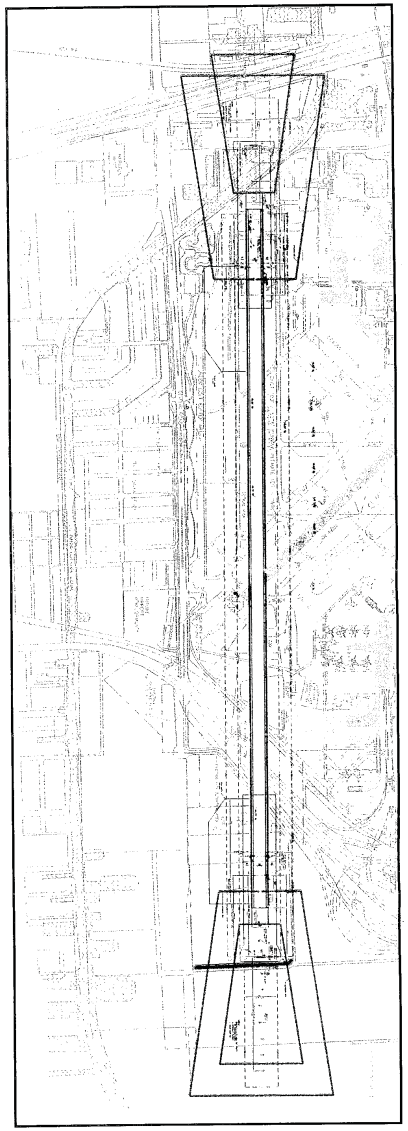
We look forward to the successful completion of this project and if you have any questions or require additional information feel free to contact me.

Sincerely,

Tom Jargiello
Director of Aviation

Attachment

cc: Walt Houghton
David P. Bjorneboe
Diana D. Lewis
Gary Sypek
Barbara Hill



FLORIDA DEPARTMENT OF STATE
David E. Mann
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. John Whitaker
Janus Research
1300 N. Westshore Boulevard, Suite 100
Tampa, FL 33607

December 28, 2005

Re: DHR Project File No. 2005-12090 / Received by DHR: November15, 2005- Additional Information Received: December 27, 2005
Cultural Resource Assessment Survey and Desktop Analysis for the Fort Lauderdale-Hollywood International Airport, Broward County, Florida

Dear Mr. Whitaker:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value.

In November 2004, Janus Research conducted an archaeological and historical cultural resource assessment survey and desktop analysis of the Fort Lauderdale-Hollywood International Airport on behalf of Landrum & Brown. Two previously recorded historic sites, and three unrecorded historic sites were identified within the project area during the investigation.

The Link Trainer Building site (8BD2562), a historic military training facility, was relocated within the project area. The structure 8BD2562 remains listed in the NRHP, and presently functions as a museum.

Three previously unrecorded historic structures (8BD4154-4156) and a historic canal (8BD3221) were identified within the project area. Due to relocation of one of the resources, ubiquity of architectural type and modifications, it is the opinion of Janus Research, Inc. that 8BD4154-4156 and 8BD3221 do not appear eligible for listing in the *NRHP*.

Additionally, change of status forms were submitted for ten historic structures (8BD2561 and 8BD2889-2897) which have been demolished.

It is the opinion of Janus Research. that the proposed development will have no effect on cultural resources listed or eligible for listing in the *NRHP*, or otherwise of historical, architectural or archaeological value. Janus Research recommends no further investigation of the subject parcel.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • http://www.flheritage.com

☐ Director's Office (850) 245-6300 • FAX: 245-6436
☐ Archaeological Research (850) 245-6444 • FAX: 245-6436
■ Historic Preservation (850) 245-6333 • FAX: 245-6437
☐ Historical Museums (850) 245-6400 • FAX: 245-6433
☐ Southeast Regional Office (954) 467-4990 • FAX: 467-4991
☐ Northeast Regional Office (904) 825-5045 • FAX: 825-5044
☐ Central Florida Regional Office (813) 272-3843 • FAX: 272-2340

Based on the information provided, our office concurs with these determinations and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

If you have any questions concerning our comments, please contact Eric Hamilton, Historic Sites Specialist, by phone at (850) 245-6333, or by electronic mail at eihamilton@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

Frederick P. Gaske, Director, and
State Historic Preservation Officer

LEIGH FISHER ASSOCIATES
A Division of Jacobs Consultancy Inc.

555 Airport Boulevard, Suite 300
Burlingame, California 94010 U.S.A.
1.650.579.7722 Fax 1.650.343.5220

August 22, 2006
[Revised August 24, 2006]

MEMORANDUM

To: Virginia Lane, AICP, Environmental Specialist
Federal Aviation Administration

From: Max Wolfe / Eric Bernhardt

Subject: Sponsor's Proposed Project Operational Assumptions

Per Tom Jargiello's letter of August 22, 2006 which responds to you letter of August 7, 2006 Leigh Fisher Associates has prepared the operational assumptions for the Sponsor's proposed airfield configuration in 2012. Detailed operational assumptions are summarized in the following sections. A corresponding runway use table is attached to this memorandum.

Proposed Project Physical Characteristics

The physical characteristics of the Sponsor's Proposed Project are documented in an August 7, 2006, letter from FAA to BCAD. The Sponsor's Proposed Project includes lengthening and widening Runway 9R-27L to a length of 8,000 feet of usable pavement by 150 feet wide with a Category I Instrument Landing System on both runway ends. As part of the project, Runway 13-31 would be decommissioned.

2012 Operational Assumptions

The operational assumptions presented herein were those used by LFA to prepare the noise contours for the SR-2 case in the November 2003 LFA report, *Assessment of Airfield Development Alternatives*. The assumptions were derived from the following documents: (1) the November 2002 FAA report, *Second Supplement to the Draft EIS (SSDEIS)*; (2) Interlocal Agreement between the City of Dania Beach and Broward County); and (3) airfield analysis conducted by as part of the November 2003.

Runway Use

The assignment of specific aircraft user groups (heavy jet, commuter prop, etc.) to runway ends of the proposed airfield in 2012 was based on the following assumptions:

- No use restrictions on the North Runway
- Daytime use of the South Runway would be restricted to Stage 3 aircraft only
- The South Runway would be the primary take-off runway in east flow and the primary landing runway in west flow.
- Aircraft exceeding 58,000 pounds would only land to the west and depart to the east on the South Runway. However, as noted below, on a limited basis, aircraft exceeding 58,000 pounds would land on the South Runway during east flow IFR or take-off on the South Runway during west flow IFR conditions to avoid unnecessary delays or due to an operational necessity such as a runway closure or equipment failure
- Nighttime operations (between 10:00 pm and 7:00 am) would be prohibited on the South Runway, except for runway closure, equipment failure, or other operational necessity.

As background information, airfield simulation analyses conducted for the November 2003 LFA report indicate that, by the 2012 to 2015 timeframe, some limited use of the extended South Runway by aircraft over 58,000 pounds landing from the west and taking-off to the west would be necessary, particularly during IFR conditions, to maintain reasonable levels of delay as provided in "Phase 2" of the Interlocal Agreement (see page 52 of that report).

Flight Tracks

Flight track assumptions are as follows:

- Departures making divergent turns of 15° or 30° should maintain the divergent heading until 3.0 nautical miles or 3,000 feet AGL before turning on course (Applies to North Runway headings of 090°, 075°, and 060°; and South Runway headings of 090° and 105°)
- Offset approaches would be provided on the North Runway only

Other Assumptions

All other operational assumptions for 2012 are unchanged from those documented in the FAA's previous definition of the Sponsor's Proposed Project (June 14, 2006, Memorandum, *FAA EIS Noise Modeling Assumptions for the 2012 Sponsor's Proposed Project Update, Fort Lauderdale-Hollywood International Airport*, Landrum & Brown, Inc.), including runway definition, number of annual average day operations, fleet mix, day-night distribution, and ground run-up noise.

* * * * *

Please call if you have any questions or required additional information. We are also prepared to transfer the operational assumptions provided herein to your EIS contractor, Landrum & Brown, Inc.

cc: Tom Jargiello, BCAD
Bob Bielek, BCAD
Bolfi Posadas, BCAD
Nick Davidson, LFA
Kim Day, LFA
Bill Dunlay, LFA
Larry Coleman, LFA
Suzie Kleymeyer, L&B
Sara Potter, L&B
Steve Martin

ATTACHMENT 1

ANNUALIZED RUNWAY USE ASSUMPTIONS
SPONSOR'S PROPOSED PROJECT -- 2012

		Runway						
User Group		**09L**	**09R**	**13**	**27R**	**27L**	**31**	**Total**
				Air Carrier / Cargo				
Heavy Jet	*Takeoff*							
	Daytime	17%	63%	--	17%	3%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	69%	11%	--	3%	17%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%
Large Jet	*Takeoff*							
	Daytime	18%	62%	--	17%	3%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	69%	11%	--	3%	17%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%
				Commuter / Air Taxi				
Commuter Jet	*Takeoff*							
	Daytime	26%	54%	--	17%	3%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	69%	11%	--	3%	17%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%
Commuter Prop	*Takeoff*							
	Daytime	14%	66%	--	17%	3%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	66%	14%	--	3%	17%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%
				General Aviation / Military				
General Aviation Jet	*Takeoff*							
	Daytime	11%	69%	--	17%	3%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	69%	11%	--	3%	17%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%
General Aviation Prop	*Takeoff*							
	Daytime	19%	61%	--	15%	5%	--	100%
	Nighttime	77%	3%	--	20%	--	--	100%
	Landing							
	Daytime	61%	19%	--	5%	15%	--	100%
	Nighttime	77%	3%	--	18%	2%	--	100%

DEC 1 8 2006

BROWARD COUNTY FLORIDA

PARKS AND RECREATION DIVISION
950 N.W. 38TH Street • Oakland Park, Florida 33309-5982 • 954-357-8100 • TTY 954-537-2844 • FAX 954-537-2849

Winner of the National Gold Medal Award for Excellence in Park and Recreation Management
Accredited by the Commission for Accreditation of Parks and Recreation Agencies (CAPRA)

December 12, 2006

Ms. Virginia Lane, Environmental Specialist
Federal Aviation Administration
Orlando Airport District Office
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822-5024

RE: Proposed Temporary Installation of Pipe/West Lake Park

Dear Ms. Lane,

The Broward County Parks and Recreation Division has received your letter regarding the Fort Lauderdale-Hollywood International Airport and potential temporary construction impacts to West Lake Park. This proposal involves transporting dredge material from the Port Everglades area to the Airport via the use of slurry pipe. The temporary installation of slurry pipe would extend over a portion of West Lake Park, utilizing an existing gravel/fill access right-of-way, located north of the Dania cut-off canal, in an area that we refer as the 44 acre preserve.

The 44 acres are tidally flushed mangroves, and the referenced gravel/fill areas right-of-way was constructed in the late 1980's, with approved permits through regulatory agencies, for a future road extension. There are culverts placed underneath this fill material, allowing tidal water to flow in a north/south direction, to maintain healthy mangrove ecosystems north and south of the referenced gravel/fill access right-of-way. The slurry pipe would be placed on the fill material to move material in an east-west direction.

Broward County Parks and Aviation staff met on site Friday, December 8 to check the proposed alignment. The Parks and Recreation Division understands, recommends and agrees that:

1) Impacts to West Lake Park would be temporary.

2) Nature and magnitude of any changes to West Lake Park would be minimal.

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org/parks

3) A daily visual check be made of the pipeline to ensure that no permanent adverse effects are made to the mangrove preserve areas of West Lake Park, nor would there be interference with activities or purpose of the resource; and

4) The land, where permission is being granted would be fully restored.

Please contact me if further assistance is needed, (954) 357-8113.

Sincerely,

Gil MacAdam
Environmental Administrator

Cc: Bob Harbin, Director, Parks and Recreation Division
Bob Bielek, Interim Director, Broward County Aviation Division
Jim Davis, Manager, West Lake Park

-----Original Message-----
From: Robin Wiebler [mailto:Robin.Wiebler@noaa.gov]
Posted At: Thursday, May 17, 2007 9:45 AM
Posted To:
Conversation: DEIS for Development and Extension of Runway 9R/27L
Subject: DEIS for Development and Extension of Runway 9R/27L

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5511
(727) 824-5317; FAX (727) 824-5300
http://sero.nmfs.noaa.gov/

May 17, 2007 F/SER4:JK/pw

Virginia Lane
Environmental Specialist
U.S. Department of Transportation
Federal Aviation Administration
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Dear Ms. Lane:

NOAA's National Marine Fisheries Service (NMFS) reviewed the draft Environmental Impact Statement (EIS), dated March 21, 2007, for the development and extension of runway 9R/27L and other associated airport projects at the Fort Lauderdale-Hollywood International Airport (FLL). The draft EIS, prepared by the Federal Aviation Administration (FAA), describes the environmental impacts associated with the airport projects proposed by the Broward County Board of County Commissioners (Broward County), which is the owner and operator of FLL. According to the draft EIS, the existing airfield lacks sufficient capacity to accommodate the forecasted demand for its use under acceptable operating conditions. In order to address this need, Broward County has proposed: expansion and elevation of Runway 9R/27L; construction of an outer dual parallel taxiway that would be separated from the proposed north side parallel taxiway by 276 feet; construction of connecting taxiways from the proposed full-length parallel taxiway to existing taxiways; and construction of an Instrument Landing System (ILS) for landings on Runway 9R/27L. Runway 9R/27L would have a Category I ILS, which includes a Medium Intensity Approach Light System (MALSR) with runway alignment indicator lights, a localizer, and a glideslope. The proposed work will also include decommissioning of Runway 13/31 and redevelopment of a terminal gate.

The draft EIS presents an analysis of several on-site and offsite site alternatives, in addition to the no-action alternative. The FAA does not present a preferred alternative in the draft EIS, hence the draft EIS does not include a statement of the overall impact of the proposed actions on essential fish habitat (EFH), as required by 50 CFR Section 600.920(e). However as an indication of what the FAA's preferred alternative might be, Broward County's preferred alternative is presented. Broward County's preferred alternative (Alternative B1c) would impact approximately 15.41 acres of wetlands including 3.05 acres of estuarine emergent vegetation (mangroves), which are designated as EFH. Other alternatives presented (such as Alternative D1) could adversely affect as much as 21.87 acres of wetlands. The airport expansion activities are located in waters of the Unites States adjacent to the Dania cut-off canal and Atlantic

Intracoastal Waterway (AIWW) in Broward County, Florida. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Consultation History
By letter dated April 6, 2001, NMFS responded to the draft EIS, dated February 5, 2001, for the expansion of runway 9R/27L. In this letter, NMFS requested that the FAA consult with our office pursuant to 50 CFR Section 600.920 for adverse affects to EFH. By letter dated January 23, 2002, NMFS provide comments on the December 26, 2001, EFH assessment prepared for the expansion of runway 9R/27L. This assessment described impacts to 17.8 acres of mangroves. In this letter, we provided three EFH conservation recommendations: (1) A plan shall be developed and implemented to avoid and/or minimize direct, secondary, and cumulative adverse effects to wetlands; (2) A plan shall be developed for providing full, in-kind compensation for unavoidable adverse impacts to wetlands; and (3) A monitoring plan shall be developed to assess the ecological success of the offsite, compensatory mitigation.

A supplement to the draft EIS was published during February 2002 to update aviation forecasts. NMFS did not find that the supplemental information affected the previously described impacts to EFH and, therefore, NMFS did not provide comments. By letter dated January 13, 2003, NMFS provided comments on the November 2002 second supplement to the draft EIS. This second supplement discussed changes regarding noise impacts and the mitigation of such impacts. Again, NMFS determined that the proposed adverse affects to EFH did not change as a result of the supplemental information and, therefore, we did not provide additional comments. However, in this letter we restated the three EFH conservation recommendations provided earlier.

In 2005, the FAA chose to restart the environmental analysis given Broward County's decision to pursue additional airside and landside planning studies in 2003 and 2004. As a result of these studies, a revised project was developed. In preparation of the present (fourth) draft EIS, the FAA has relied on the recent planning and technical studies completed by Broward County.

Project Area
NMFS staff is familiar with the area and has conducted site visits at FLL, most recently on August 10, 2006. The wetland system at FLL consists of mangroves (red mangroves, white mangroves, black mangroves, and buttonwoods) with various degrees of infestation by Australian pine and Brazilian pepper.

Alternatives
The draft EIS describes 11 offsite alternatives, 18 on-site alternatives, and the no action alternative. The FAA determined that the 11 offsite alternatives were not reasonable and therefore eliminated these alternatives from further evaluation. The FAA determined that six of the on-site alternatives could meet the purpose established for the project.

Impacts to Essential Fish Habitat
Of the six alternatives that the applicant determined would meet the project purpose and need, the impacts to EFH vary from 0.13 to 3.05 acres. An EFH assessment is provided in Section 6.F.1.4 of the draft EIS. Broward County's preferred alternative would directly impact 3.05 acres of mangroves. We acknowledge and appreciate the substantial impact minimization that has occurred since the initial draft EIS review during 2001, which identified over 17 acres of EFH that would be impacted by the project.

The Broward County's preferred alternative (Alternative B1c) includes the following components that would adversely affect EFH:

- Expansion and elevation of Runway 9R/27L to an overall length of 8,000 feet and width of 150 feet and construction of a new full-length parallel taxiway 75 feet wide on the north side of Runway 9R/27L with separation of 400 feet from 9R/27L. This action would adversely affect 2.87 acres of mangroves.
- Installation of runway approach lights and associated access roads. This action would adversely affect 0.38 acres of mangroves.

Authorization of the proposed project will result in the loss of 3.05 acres of habitats designated as EFH by the South Atlantic Fishery Management Council (SAFMC). Federally managed fishery species associated with estuarine emergent vegetation, including mangrove habitat, includes postlarval, juvenile, and adult gray, lane and schoolmaster snappers; juvenile Goliath grouper and mutton snapper; and adult white grunt. These areas play an important role in the ecological function of South Atlantic estuarine ecosystems, particularly in regard to primary production and water quality. Detailed information on the snapper/grouper complex (containing ten families and 73 species) and other federally managed fishery species and their EFH is provided in the 1998 comprehensive amendment to the fishery management plans for the South Atlantic region; the amendment was prepared by the SAFMC as required by the Magnuson-Stevens Act. Mangrove wetlands are also designated by the SAFMC as a Habitat Area of Particular Concern (HAPC), which are subsets of EFH that are rare, particularly susceptible to human-induced degradation, especially important ecologically, or located in an environmentally stressed area.

In addition to these designations by the SAFMC, mangroves in this area provide nursery, foraging, and refuge habitat for other commercially and recreationally important fish and shellfish, such as snook, striped mullet, tarpon, and blue crab, and that the cumulative loss of mangroves has reduced overall fisheries production within the southeast Florida ecosystem. Further, mangroves in the project area indirectly support fishery habitat by controlling runoff and turbidity and by stabilizing sediment, ecological functions essential to supporting adjacent waters of the Dania cut-off canal and AIWW.

Mangrove wetlands directly benefit the fishery resources of the southeast Florida by providing nursery habitat. Further, mangroves are part of a habitat complex that includes seagrass and hard bottom habitats, and this complex supports a diverse community of fish and invertebrates. Mangrove wetlands also provide important water quality maintenance functions, such as pollution uptake (bio-assimilation). Mangroves also stabilize shorelines, attenuate wave action, and produce and export detritus (decaying organic material), which is an important component of

marine and estuarine food chains. The cumulative loss of these habitats has and continues to reduce overall fisheries production within Florida waters. In fact, mangrove forests are one of the world's most threatened tropical ecosystems with global loss exceeding 35 percent, and the current rates of mangrove deforestation are likely to impact severely the function, fisheries productivity, and resilience of reefs (Mumby et. al 2004)[1].

EFH Assessment Information Needs

The draft EIS provides several items required by 50 CFR Section 600.920(e) for an EFH assessment, including a description of the proposed action, an analysis of direct impacts to fishery resources by life history stage, avoidance and minimization to EFH, and alternatives to the proposed action. However additional information is needed in order for NMFS to fully evaluate the proposed work:

- A full assessment of cumulative effects. In this regard, we note that there are a few past, present, and reasonably foreseeable future activities that have been omitted in the cumulative effects discussion (draft EIS, chapter 7), including the proposed U.S. Border Patrol facility (associated with U.S. Army Corps of Engineers permit application number SAJ-2006-3233) that proposes to adversely affect over 4 acres of mangroves. NMFS is concerned that, as a result of cumulative impacts to EFH in Broward County, little to no compensatory mitigation options are available within the affected watershed. Therefore, we recommend that the cumulative effects assessment provide a table of past, present, and reasonably foreseeable EFH impacts that includes a description of how such impacts have been/will be mitigated.
- The FAA's, or lead federal agency's, views regarding the effects of the action on EFH. Although the FAA states that each alternative would not result in a significant impact to EFH, this determination is based on the assumption that the impacts can be mitigated (see next item).
- Compensatory mitigation plan. The draft EIS states that there may be compensatory mitigation options available at West Lake Park associated with the habitat restoration authorized by the Department of the Army via permit number 2002-0072 (IP-LAO), however we are also aware of other projects by the Broward County Board of County Commissioners (such as the Port Everglades Expansion) that propose to use this mitigation as well. The EFH assessment should fully describe how mangrove impacts would be mitigated. (See EFH conservation recommendations for additional information.)
- Unified Mitigation Assessment Method (UMAM) scores. The draft EIS provides UMAM scores for the wetland areas proposed for impact under Broward County's preferred alternative. However, the only way to determine the amount of mitigation necessary to offset 3.05 acres of mangrove wetlands would be to have UMAM scores for the mitigation site, which are not included in the draft EIS. The compensatory mitigation plan should include all necessary UMAM scores to determine that all functional losses can be mitigated.

[1] Mumby P.J., J. E. Alasdair, E. Arias-Gonzalez, K.C. Lindeman, P.G. Blackwell, A. Gall, M.I. Gorczynska, A.R. Harborne, C.L. Pescod, H. Renken, C.C. Wabnitz, and G. Llewellyn. 2004. Mangroves enhance the biomass of coral reef fish communities in the Caribbean. Nature 27: 533-536.

Based on the above discussion of direct and indirect impacts likely to result from the proposed project, NMFS concludes that the potential adverse impacts to EFH and other living marine resources could occur as a result of the proposed work. Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH conservation recommendations when an activity is expected to adversely impact EFH. Based on this requirement, NMFS provides the following:

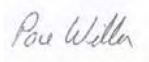
EFH Conservation Recommendations

1. A plan shall be developed for providing full, in-kind compensation for unavoidable adverse impacts to wetlands. The plan shall address compensation for loss of productivity and habitat functions that occur during the period between elimination/degradation of existing wetlands and establishment of functionally compatible mangrove habitat that would be protected in perpetuity. Execution of the approved mitigation plan shall be a required component of the project.

2. A monitoring plan shall be developed to assess the ecological success of the offsite, compensatory mitigation. Annual monitoring of the mitigation site shall take place for five years following completion of the mitigation project. In the event it is determined that the implemented mitigation measures do not completely offset the destruction of mangrove wetlands, the plan shall include contingency measures, such as additional planting or exotic vegetation removal, in order to provide functionally suitable replacement habitat. The mitigation/monitoring plan shall be forwarded to the NMFS for review and approval prior to initiation of construction.

Thank you for the opportunity to provide comments. Related correspondence should be directed to the attention of Ms. Jocelyn Karazsia at our West Palm Beach office, which is co-located with the US Environmental Protection Agency at USEPA, 400 North Congress Avenue, Suite 120, West Palm Beach, Florida, 33401. She may be reached by telephone at (561) 616-8880, extension 207, or by e-mail at Jocelyn.Karazsia@noaa.gov.

Sincerely,



/ for
Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc: (via electronic mail)
EPA, WPB
FWS, Vero Beach
Broward County
FWC, Tallahassee
FDEP, WPB
SAFMC
F/SER Keys
F/SER3
F/SER47, Karazsia

FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Ms. Virginia Lane
Orlando Airports District Office
Federal Aviation Administration
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

July 17, 2007

RE: DHR Project File No.: 2007-2396-B & 2007-2527-B/Recieved: June 14, 2007
Federal Aviation Administration (FAA)
Additional Information for the for the Draft Environmental Impact Statement
Fort Lauderdale-Hollywood International Airport, Broward County

Dear Ms. Lane:

We reviewed the above referenced additional information in response to our April 13, and May 30, 2007 letters (DHR Project File Nos. 2007-2396 & 2007-2527), which consisted of 56 black and white pictures and an archeological review of the expanded Detailed Study Area. This office finds the addendums to the above study complete and sufficient, and concurs with Janus Research that there are no historic properties in the Area of Potential Affect.

If you have any questions, **please contact James Toner, Historic Sites Specialist, by telephone at 850-245-6333, or by electronic mail** ***jetoner@dos.state.fl.us***.

Sincerely,

Frederick P. Gaske

Frederick P. Gaske, Director, and
State Historic Preservation Officer

XC: Christopher Eck, Broward County
Julie Walls, City of Hollywood
Michael Sizelsky, City of Fort Lauderdale
Amy Streelman, Janus Research

500 S. Bronough Street • Tallahassee, FL 32399-0250 • http://www.flheritage.com

☐ Director's Office (850) 245-6300 • FAX: 245-6436
☐ Archaeological Research (850) 245-6444 • FAX: 245-6452
☑ Historic Preservation (850) 245-6333 • FAX: 245-6437
☐ Historical Museums (850) 245-6400 • FAX: 245-6433
☐ Southeast Regional Office (561) 416-2115 • FAX: 416-2149
☐ Northeast Regional Office (904) 825-5045 • FAX: 825-5044
☐ Central Florida Regional Office (813) 272-3843 • FAX: 272-2340

BROWARD COUNTY FLORIDA

JOSEPHUS EGGELLETION, JR.
Mayor
Board of County Commissioners - District 9
e-mail: jeggelletion@broward.org

Downtown Office
Cynthia Martin, Aide
Dionne M. Kellier, Esq.
Legal Analyst
954-357-7009
FAX 954-357-5707

District 9 Office
Gwendolyn A. Hudson, Aide
954-327-3877
FAX 954-327-3879

August 10, 2007

Mr. Bart Vernace, Assistant Manager
Orlando Airports District Office, FAA
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822

Re: Broward County (Sponsor) Preferred Runway Alternative

Dear Mr. Vernace:

Please allow this letter to serve as official notification of Broward County's preferred runway alternative. On December 9, 2003, the Board of County Commissioners formally designated what is essentially Alternative B1C in the Draft Environmental Impact Statement as its preferred runway alternative noting the modification which uses Engineered Material Arresting Systems (EMAS) to reduce the 1000' safety clearance zone.

On June 5, 2007, the Board of County Commissioners ratified the B1C Alternative as its preferred runway alternative. The vote for this alternative was six to three. For your information, there was only one other alternative that received any interest, Alternative D2, and it failed two to seven.

If you have any questions, please feel free to contact me at 954-357-7009.

Sincerely,

Josephus Eggelletion

Josephus Eggelletion, Mayor
Broward County, Florida

C: Board of County Commissioners (e-copy)
Pam Brangaccio, County Administrator (e-copy)
Bertha Henry, Deputy County Administrator (e-copy)
Walt Houghton, Interim Aviation Director (e-copy)
Mark Perryman, Landrum and Brown (e-copy)

Reply to:
☐ 1176 N.W. 42nd Way, Lauderhill, Florida 33313
☐ 115 South Andrews Avenue, Room 421, Fort Lauderdale, Florida 33301

BROWARD COUNTY
FLORIDA

AVIATION DEPARTMENT - Fort Lauderdale/Hollywood International Airport
100 Aviation Boulevard • Fort Lauderdale, Florida 33315 • 954-359-6100

November 9, 2007

Ms. Virginia Lane
Federal Aviation Administration (FAA) - Orlando District Office
5950 Hazeltine National Drive
Orlando, FL 32822-5024

Re: Broward County Proposed Noise Mitigation Principles

Ms. Lane:

Pursuant to the FAA's request, this letter represents the Broward County Aviation Department's (BCAD) submission of the Noise Mitigation Principles that are proposed for inclusion in the FAA's Environmental Impact Statement (EIS) and Record of Decision (ROD) associated with development and extension of the preferred runway alternative and other associated projects at the Fort Lauderdale-Hollywood International Airport (FLL). Below is an outline of the seven (7) noise mitigation principles the County is recommending to be considered by the FAA regarding existing and forecasted conditions for FLL.

1. **Apply the long-term/ultimate unrestrained contour** - Apply mitigation principles and identify mitigation eligibility areas using the long-term/ultimate unrestrained contour of the Runway Alternative approved in the ROD.
2. **Establish mitigation areas based on neighborhoods** - Utilizing the contours of the approved project; establish areas eligible for mitigation with the objective of keeping neighborhoods intact by incorporating natural boundaries and neighborhood blocks.
3. **Voluntary acquisition of mobile home parks in the +65 DNL** - Relocation of residents and acquisition of the mobile home park/business. Convert the property to a compatible use. In accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, provide relocation assistance for residents to either County developed affordable housing or other locations. Future use of the acquired property would be controlled by recorded restrictive covenants.
4. **Sound proofing and easement** - Soundproofing offered to all eligible single- and multi-family units; in addition compensation for outdoor impacts will be offered above Uniform Appraisal Standards for Federal Land Acquisitions at a valuation that will be determined at implementation of the program.
5. **Purchase assurance / sales guarantee** - For those that decline soundproofing, implement a purchase assurance program to acquire the property at Fair Market Value. Future use of the acquired property would be controlled by recorded restrictive covenants.
6. **Voluntary acquisition of existing residentially zoned vacant parcels** - Voluntarily acquire existing residentially-zoned, vacant parcels at Fair Market Value and coordinate with the local communities to change the zoning and land use plan to compatible use. Future use of the acquired property would be controlled by recorded restrictive covenants.
7. **Provide noise mitigation in excess of minimum federal guidelines.**

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

Please feel free to contact BCAD staff with any questions or concerns regarding this matter at (954) 359-6181.

Sincerely,

Kent George
Director of Aviation

cc: Bertha Henry, Interim County Administrator
Zach Williams, Assistant County Administrator
Dick Brossard, Assistant County Administrator
Debbie Bowers, Assistant to the County Administrator
Yasmi Govin, Assistant County Attorney
Doug Webster, Assistant to the Department Director, Aviation Department
Marc Gambrill, Acting Director of Planning & Development, Aviation Department

AVIATION DEPARTMENT - Fort Lauderdale/Hollywood International Airport
100 Aviation Boulevard • Fort Lauderdale, Florida 33315 • 954-359-6100

December 4, 2007

Ms. Virginia Lane
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

RE: Use of Wetland Mitigation Credits at West Lake Park for Airport Sponsors Proposed Project at Ft. Lauderdale-Hollywood International Airport Broward County, Florida

Dear Ms. Lane:

In response to your letter request dated October 18, 2007, Broward County acknowledges that mitigation may be required to offset wetland impacts resulting from runway development at FLL. Broward County may offset these impacts as appropriate by encumbering existing mitigation credits previously developed by Broward County at existing mitigation sites, by performing on-site mitigation if necessary, and by using mitigation credits identified in the United States Army Corps of Engineers Permit No. SAJ-2002-00072 (IP-LAO) and the South Florida Water Management District Individual Resource Permit No. 06-04016-P issued for West Lake Park.

Should you require additional information do not hesitate to contact me.

Respectfully,

Marc Gambrill, P.E.
Acting Director, Planning and Development Aviation

cc: Kent George, Director Aviation
Debbie Bowers, Assistant to County Administrator
Barbara Hill, Assistant County Attorney
File

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

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BROWARD COUNTY
FLORIDA

AVIATION DEPARTMENT - Fort Lauderdale/Hollywood International Airport
100 Aviation Boulevard • Fort Lauderdale, Florida 33315 • 954-359-6100

December 7, 2007

Mr. Dean Stringer
Manager, Orlando Airports District Office
Federal Aviation Administration
5950 Hazeltine National Drive
Suite 400
Orlando, FL 32822

Dear Mr. Stringer:

I would like to take this opportunity to address various comments made by and correspondence written by the Ft. Lauderdale-Hollywood International Airport (FLL) Air Traffic Control Tower Manager Robert Berlucchi, concerning the Sponsor's Preferred Alternative, the B1c Alternative, for a new runway at FLL. Mr. Berlucchi favors the D2 Alternative, which we believe is far inferior to the B1c Alternative, which will result in an increase in capacity and a reduction in aircraft delays.

The Broward County Aviation Department (BCAD) feels that there is additional information to supplement the Draft Environmental Impact Statement (DEIS) on the D2 Alternative that needs to be considered by the Federal Aviation Administration (FAA) in light of Mr. Berlucchi's observations. We have concluded that the D2 Alternative will result in significant and costly tenant relocation, loss of any future tenant expansion capabilities, complete elimination of any future aviation development growth and, when completed in its entirety, create an unbalanced airfield vs. terminal/landside situation. Supportive information follows:

In the DEIS, we feel the land deficiency in the D2 Alternative is understated. The attached D2 Alternative, Exhibit 1, analysis indicates there will be a deficiency of 42.14 acres of land on FLL to relocate the current tenants on the North side to other locations on the airport, which would necessitate utilizing all of the area on the West side. Additionally, if the land that would be available under the Sponsor's Preferred Alternative, the B1c, is analyzed, see Exhibit 2, approximately 147.57 new acres of land would become available for future tenant expansion and new opportunities (Exhibit 3 shows Existing Conditions and is included for informational purposes).

Broward County Board of County Commissioners
Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

Therefore, if the D2 Alternative was pursued, a loss of approximately 189.71 acres would be realized, not the 42.14 acres estimated in the DEIS.

Following that analysis, the replacement facilities, infrastructure development and tenant relocation costs are estimated to total $550.4 million, as delineated below:

- Based on the current 1.428 million square feet of facilities on the North side; vertical construction costs of $250/SF in Broward County; estimated replacement construction cost for aprons, taxiways, parking, and other infrastructure, the costs to reconstruct facilities for the current tenants would be $520 million.
- Required adjoining physical infrastructure costs, including improvements to Lee Wagener, Perimeter Road and Ravenswood Road; widening of S.W. 42 Street; tunnel construction for cargo facilities; and Perimeter Road reconfiguration, result in an estimated infrastructure cost totaling approximately $24 million.
- For construction of facilities and infrastructure, 25% is added for design and construction administration, estimated at $136 million.
- Total tenant relocation costs of $6.4 million were based on a "move cost" factor for each business based on the nature of the business operations.

With the loss of approximately 189.71 acres, FLL will realize economic opportunity losses estimated at $1.3 billion direct impact and $1.72 billion indirect impact calculated below (using a 4.5% discount factor with 2% yearly inflation factor over the standard airport lease period of 20 years):

- Broward County Office of Economic Development (OED) provided an analysis of the economic benefit of the current North side tenants, resulting in $58 million direct and $82 million indirect annual benefits.
- Based on the current 139 acres occupied by tenants on the North side and using the benefits derived by OED, results in a direct and indirect per acre benefit respectively, of $417,000 and $590,000, on an annual basis.
- Applying the direct and indirect per acre figures above to the 189.71 acres lost under the D2 Alternative, results in a $79.1 million direct and $111.9 million indirect net economic benefit loss annually.

- In addition to the economic impact to the region, FLL has calculated lost revenue opportunity in the form of ground rent, landing fees and fuel flowage fees totaling approximately $7 million annually.

In closing, the resultant net present value lost benefit impact over a 20 year period, both direct and indirect, equates to a conservative amount of $3.02 billion, plus $550.4 million of infrastructure costs if the D2 Alternative is chosen.

Please feel free to contact me if there should be any questions. Thank you in advance for your consideration of this information.

Sincerely,

Kent G. George, A.A.E.
Director of Aviation

KGG/ml

Attachments

cc: Bertha Henry, Interim County Administrator
Dick Brossard, Assistant County Administrator
Debbie Bowers, Assistant to the County Administrator
Mark Perryman, Landrum & Brown
Bart Vernace, Federal Aviation Administration

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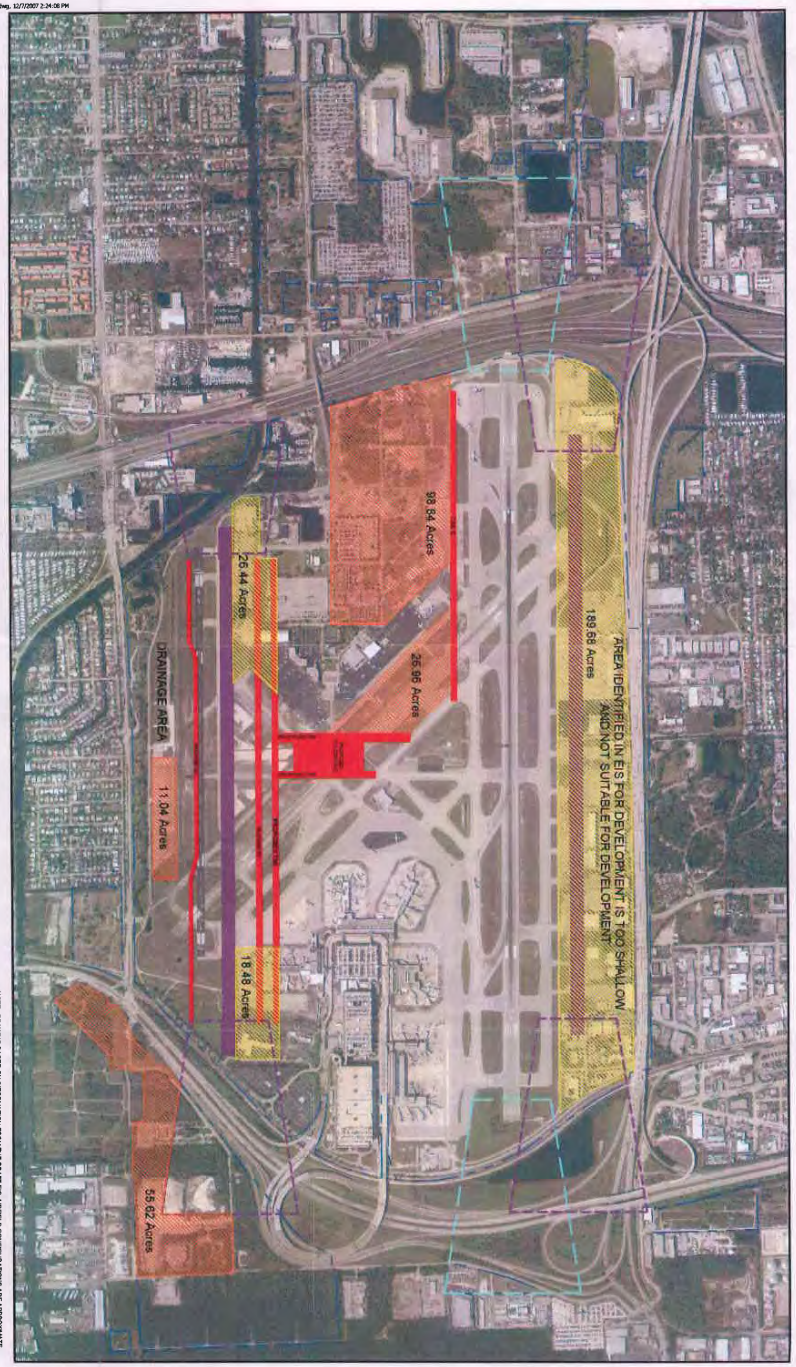
NEW DEVELOPMENT OPPORTUNITIES - D2 OPTION - EXHIBIT 1



BCAD PROPERTY COMMITTED TO DEVELOPMENT, UNABLE TO DEVELOP, OR NEEDS TO BE SOLD

A. APPROXIMATE LAND GAINED THROUGH NEW RUNWAY CONFIGURATION = 182.46 ACRES

B. APPROXIMATE LAND LOST THROUGH NEW RUNWAY CONFIGURATION AND RELOCATION = 234.60 ACRES

APPROXIMATE ACRES OF LAND AVAILABLE FOR NEW DEVELOPMENT (A-B)= - 42.14 ACRES

* NOTE: DETERMINED BY BCAD BUSINESS DIVISION

NOTE: DRAWING BASED ON INFORMATION FROM THE DRAFT EIS. AIRFIELD CONFIGURATIONS ARE APPROXIMATE. CAD DRAWINGS WERE UNAVAILABLE AT THIS TIME.

FORT LAUDERDALE-HOLLYWOOD INTERNATIONAL AIRPORT

NEW DEVELOPMENT OPPORTUNITIES - B1b/B1c OPTION - EXHIBIT 2

* BCAD PROPERTY COMMITTED TO DEVELOPMENT, UNABLE TO DEVELOP, OR NEEDS TO BE SOLD

A. APPROXIMATE LAND GAINED THROUGH NEW RUNWAY CONFIGURATION = 173.87 ACRES

B. APPROXIMATE LAND LOST THROUGH NEW RUNWAY CONFIGURATION AND RELOCATION = 26.30 ACRES

APPROXIMATE ACRES OF LAND AVAILABLE FOR NEW DEVELOPMENT (A-B) = 147.57 ACRES

* NOTE: DETERMINED BY BCAD BUSINESS DIVISION

NOTE: DRAWING BASED ON INFORMATION FROM THE DRAFT EIS, AIRFIELD CONFIGURATIONS ARE APPROXIMATE. CAD DRAWINGS WERE UNAVAILABLE AT THIS TIME

FORT LAUDERDALE-HOLLYWOOD INTERNATIONAL AIRPORT

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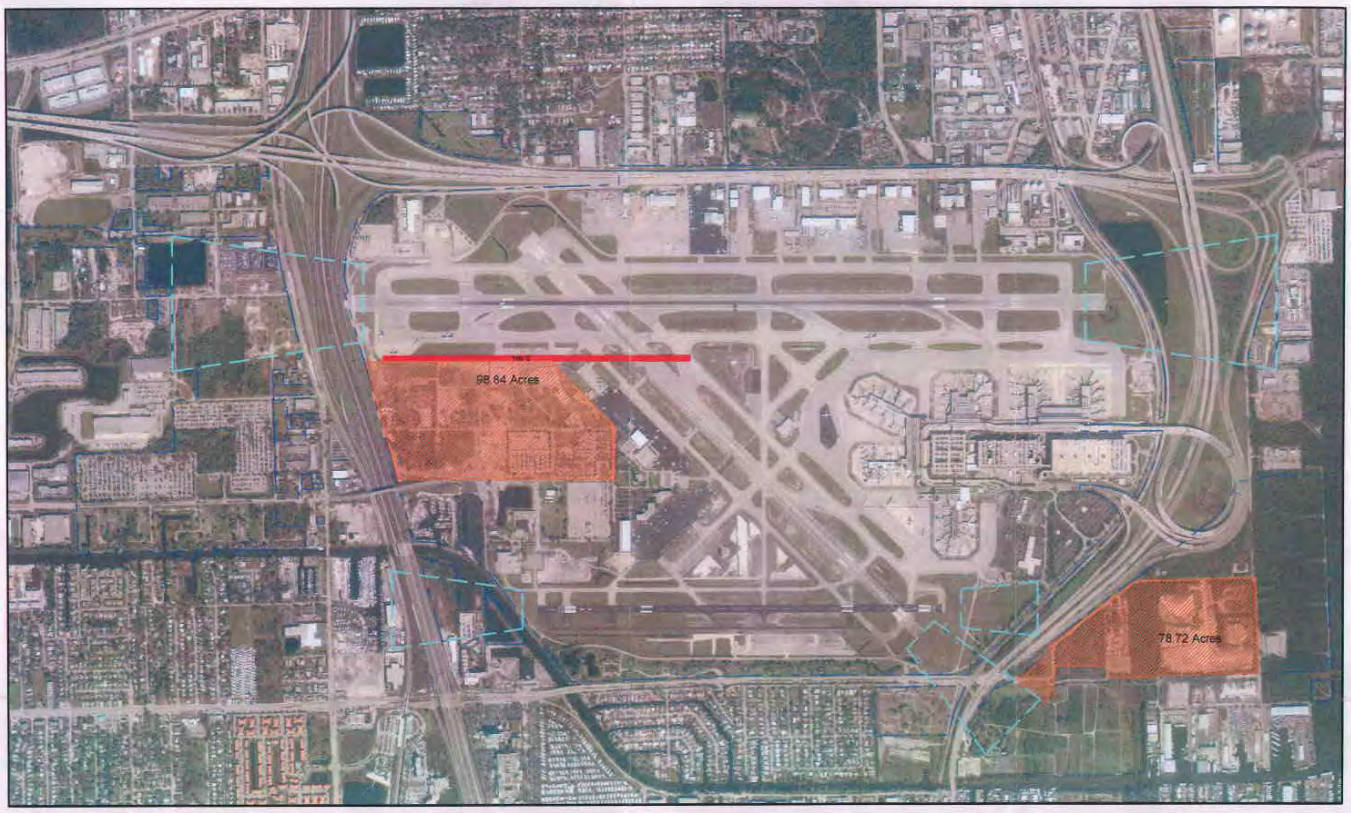
NEW DEVELOPMENT OPPORTUNITIES - EXISTING CONDITIONS - EXHIBIT 3



* BCAD PROPERTY COMMITTED TO DEVELOPMENT, UNABLE TO DEVELOP, OR NEEDS TO BE SOLD

APPROXIMATE ACRES OF LAND AVAILABLE FOR NEW DEVELOPMENT = 177.56 ACRES

* NOTE: DETERMINED BY BCAD BUSINESS DIVISION

FORT LAUDERDALE-HOLLYWOOD INTERNATIONAL AIRPORT

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RECEIVED FEB 0 1 2008

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Florida Ecological Services Office
1339 20th Street
Vero Beach, Florida 32960

January 31, 2008

Virginia Lane
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

Service Federal Activity Code: 41420-2007-FA-0701
Service Consultation Code: 41420-2007-I-1116
Date Received: January 28, 2008
Project: Expansion of Runway 9R/27L at Fort Lauderdale-Hollywood International Airport
County: Broward

Dear Ms. Lane:

The Fish and Wildlife Service (Service) has reviewed your letter dated January 23, 2008, and other information submitted by the Federal Aviation Administration (FAA), for the project referenced above. This letter is submitted in accordance with section 7 of the Endangered Species Act of 1973, as amended (Act) (87 Stat. 884; 16 U.S.C. 1531 *et seq.*).

PROJECT DESCRIPTION

The Broward County Board of County Commissioners (BCBCC) has proposed to conduct improvements to the Fort Lauderdale-Hollywood International Airport in order to address existing and anticipated future airfield capacity and passenger delay issues. The draft Environmental Impact Statement presents 8 alternatives to address the project and a "no build" alternative. The BCBCC preferred alternative includes the enlargement of Runway 9R/27L to 8,000 feet by 150 feet, and the construction of a new parallel taxiway located along the north side of Runway 9R/27L. The project is located at the Fort Lauderdale–Hollywood International Airport in Broward County, Florida.

THREATENED AND ENDANGERED SPECIES

West Indian Manatee

The project occurs within the geographic range of the endangered West Indian manatee (*Trichechus manatus*). To protect manatees, the FAA has agreed to follow the Service's *Standard Manatee Construction Conditions* during implementation of the project. The FAA has determined the project "may affect, but is not likely to adversely affect" the manatee. The Service concurs with this determination.

TAKE PRIDE IN AMERICA

Wood stork

The project site is located within the core foraging area (CFA) (within 18.6 miles) of a breeding colony of the endangered wood stork (*Mycteria americana*) (located approximately 14 miles northeast of the project site). The Service believes the loss of wetlands within a CFA may reduce foraging opportunities for wood storks. To minimize adverse effects to the wood stork, the Service's *Draft Supplemental Habitat Management Guidelines for the Wood Stork in the South Florida Ecological Services Consultation Area* (Service 2002) recommends the applicant replace wetlands lost due to the action. The compensation plan should include a temporal lag factor, if necessary, to ensure wetlands provided as compensation adequately replace the wetland functions lost due to the project. Moreover, wetlands offered as compensation should be of the same hydroperiod, and located within the CFA of the affected wood stork colony. In some cases, the Service accepts wetlands compensation located outside the CFA of the affected wood stork nesting colony. Specifically, wetland credits purchased from a "Service Approved" mitigation bank located outside the CFA would be acceptable to the Service, provided the impacted wetlands occur within the permitted service area of the bank.

For projects that impact 5 or more acres of wood stork foraging habitat, the Service requires a functional assessment be conducted using our "Wood Stork Foraging Analysis Methodology" (Methodology) on the foraging habitat to be impacted and the foraging habitat provided as mitigation. The Methodology can found in the Service's November 9, 2007, Eastern Indigo Snake and Wood Stork Key (Service Federal Activity Code Number 41420-2007-FA-1494) provided to the U.S. Army Corps of Engineers to guide their effect determinations for these two species. The Methodology is also described in the Service's August 28, 2007, Biological Opinion for the Terafina (G.L. Homes) development project (Service Federal Activity Code Number 41420-2007-FA-0653) located at http://www.fws.gov/filedownloads/ftp%5Fverobeach /BIOLOGICAL %5FOPINIONS/ TERAFINA/.

The FAA has proposed to provide wetland mitigation to offset the loss of wood stork foraging habitat resulting from the project. The mitigation will consist of adequate credits purchased from the West Lake Park Mitigation Project. The number of credits purchased will be based on the Service's wood stork Methodology. The FAA has determined the project "may affect, but is not likely to adversely affect" the wood stork. The Service concurs with this determination.

This letter fulfills the requirements of section 7 of the Act and further action is not required. If modifications are made to the project, if additional information involving potential effects to listed species becomes available, or if a new species is listed, reinitiation of consultation may be necessary.

Thank you for allowing us to provide these comments and for your cooperation and effort in protecting federally listed species. If you have any questions regarding this project, please contact John Wrublik at 772-562-3909, extension 282.

Sincerely yours,

Allen D. Webb

Paul Souza
Field Supervisor
South Florida Ecological Services Office

cc:
EPA, West Palm Beach, Florida (Richard Harvey)
FWC, Tallahassee Florida (Mary Ann Poole) electronic only

LITERATURE CITED

U.S. Fish and Wildlife Service. 2002. Draft Supplemental Habitat Management Guidelines for the Wood Stork in the South Florida Ecological Services Consultation Area. Fish and Wildlife Service, South Florida Ecological Services Office; Vero Beach, Florida.

U.S. Department
of Transportation
Federal Aviation Administration

ORLANDO AIRPORTS DISTRICT OFFICE
5950 Hazeltine National Dr., Suite 400
Orlando, Florida 32822-5024
Phone: (407) 812-6331

February 5, 2008

Ms. Jocelyn Karazsia
National Marine Fisheries Service
400 North Congress Avenue, Suite 120
West Palm Beach, Florida 33401

Re: Fort Lauderdale-Hollywood International Airport (FLL)
Draft Environmental Impact Statement (Draft EIS)
Essential Fish Habitat (EFH) Assessment Additional Information

Dear Ms. Karazsia:

Please find enclosed the additional information you requested in your letter dated May 17, 2007 and FAA's response to National Marine Fisheries Services' EFH Conservation Recommendation. The FAA has determined the Proposed Action would not result in significant adverse impacts to EFH or significant cumulative impacts to wetlands and EFH based on the proposed mitigation for the Proposed Action and mitigation that would be required for other projects in the area around FLL.

We appreciate your evaluation of this information and request your determination that the consultation process satisfies the Federal agency consultation requirements of Section 305. If you have any questions regarding the attached document or require additional information, please call me at (407) 812-6331 extension #129.

Sincerely,

Virginia Lane

Virginia Lane, A.I.C.P.
Environmental Specialist

Enclosure

Cc: Miles M. Croom, NMFS

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
4400 PGA Boulevard, Suite 500
Palm Beach Gardens, FL 33410

REPLY TO
ATTENTION OF

0 6 MAR 2008

Palm Beach Gardens Regulatory Section
Fort Lauderdale-Hollywood
International Airport Draft EIS
SAJ-1995-4561

Virginia Lane
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822-5024

Dear Ms. Lane:

The US Army Corps of Engineers (USACE) received the draft Environmental Impact Statement (EIS), dated March 21, 2007, for the development and extension of runway 9R/27L and other associated airport projects at the Fort Lauderdale-Hollywood International Airport (FLL). The draft EIS, prepared by the Federal Aviation Administration (FAA), describes the environmental impacts associated with the airport projects proposed by the Broward County Board of County Commissioners (Broward County), which is the owner, operator, and Airport Sponsor of FLL. The USACE reviewed this draft EIS and responded by email on July 17, 2007, with our comments, a copy of which is attached. On January 29, 2008, the USACE received a copy of the Conceptual Mitigation plan associated with the FLL expansion project.

According to the Draft Conceptual Wetland Mitigation Plan (plan), the plan is for "potentially unavoidable impacts to jurisdictional wetlands due to the construction of the Proposed Action, Alternative B1c", the Airport Sponsor's preferred alternative. We note that the proposed mitigation plan refers only to conceptual mitigation for the Airport Sponsor's preferred alternative without reference to the other potential alternatives. In the July 17, 2007, response letter to the Draft EIS, the USACE advised that the alternatives described would result in the need for a Department of the Army permit under section 404 of the Clean Water Act. The 404(b)(1) Guidelines are the environmental standards for Section 404 permit issuance under the CWA and these guidelines require that the project permitted be the Least Environmentally Damaging Practicable Alternative (LEDPA) that meets the project's purpose and need. A permit cannot be issued, therefore, in circumstances where a less

environmentally damaging practicable alternative for the proposed discharge exists (except as provided for under Section 404(b)(2)). As there are three alternatives identified in the Draft EIS which meet the stated project purpose, the USACE recommended that FAA choose as its preferred alternative the one that is also the LEDPA. Alternative C1, was identified by the USACE as an alternative that potentially satisfied both the project purpose and the 404(b)(1) guidelines. In this alternative, there were 15.4 acres of impacts to low quality exotic impacted wetlands (11.54 acres), which do not all appear to fall within federal jurisdiction, or tree farms (3.72 acres), and with no impacts to mangroves.

Appropriate and practicable compensatory mitigation as identified in the conceptual mitigation plan is required for unavoidable adverse impacts to aquatic resources which remain after all appropriate and practicable minimization has been required. The Airport Sponsor's preferred alternative has not yet been identified as having taken all appropriate and practicable steps to avoid and minimize impacts to aqatic resources including wetland nor has it been determined to be the least environmentally damaging practicable alternative. As such, USACE recommendations are based on a review of the mitigation plan as though it were applicable to any alternative. These recommendations are not specific to any one alternative, are not meant to imply that avoidance and minimization has been demonstrated, are not meant to imply approval of any alternative, and can be applied to any of the alternatives included in the draft EIS:

1. The mitigation plan should examine the appropriateness of mitigating within West Lake Park for each of the wetland types impacted. For example:

   a. The mitigation available within West Lake Park includes estuarine habitat types other than mangroves. A brief examination could be made to consider the appropriateness of either utilizing mangrove to mangrove impacts (currently presented as minimum credits available in the draft) or by utilizing a more diverse habitat mix as is currently proposed by West Lake Park.

   b. Some of the habitats impacted by the project are more accurately identified as freshwater habitats

and justifying the appropriateness of the out of kind mitigation would clarify the document.

2. It would be helpful if the document could be clarified to include the following:

   a. The potential mitigation credits at West Lake Park are expected to be split between the FLL expansion and Port Everglades.

   b. The proposed mitigation work has not begun at West Lake Park, so the potential credits identified in the permits as potential have not yet been generated.

   c. While the work at West Lake Park has not yet begun, none of the credits at West Lake Park have yet been utilized or reserved.

3. Any mitigation proposal should consider time lag based on the temporal lag between the time of impact and the time expected for mitigation success and scoring should be adjusted.

4. Careful consideration should be given to the likelihood of success for the mitigation plan and risk consideration should be calculated into any functional analysis used to evaluate wetland function and value.

The proposed conceptual mitigation plan has been undertaken in the same geographic area (i.e., in close physical proximity and, to the extent possible, the same watershed) as the impact. In determining compensatory mitigation, the functional values lost by the resource to be impacted have been considered.

The Agency Consensus Form with the following Consensus Points is attached:

- Received and Reviewed Draft EIS Findings and Documentation
- Review of Conceptual Mitigation

Sincerely,

Tori K. White

Tori K. White
Chief, Palm Beach Gardens
Permits Section

Enclosures

Copies Furnished:

Memorandum of Agreement for Interagency Stewardship and Streamlining
Fort Lauderdale-Hollywood International Airport
Environmental Impact Statement and Permitting

Agency Consensus Form

☒ Fort Lauderdale-Hollywood International Airport Runway 9R/27L Extension Project EIS

Consensus Points:

- **Received and Reviewed Draft EIS Findings and Documentation**
- **Review of Conceptual Mitigation**

Please check one:

☒ My signature indicates that

Jon Whites USACE 6 Mar 08
Name/Agency/Date

has achieved Consensus with the FAA on the above Consensus Point.

☐ My signature indicates that

_____
Name/Agency/Date

has no statutory authority with regard to this Consensus Point.

☐ My signature indicates that

_____
Name/Agency/Date

has not achieved Consensus with the FAA on the above Consensus Point for the following reasons:

Comments(please attach additional pages as necessary):

_____

_____

_____

Oberlin, Leah A SAJ

From: Oberlin, Leah A SAJ
Sent: Tuesday, July 17, 2007 9:00 AM
To: 'Virginia.Lane@faa.gov'
Subject: Ft. Lauderdale Airport Expansion DSEIS

Ms. Lane,

The US Army Corps of Engineers (USACE) reviewed the draft Environmental Impact Statement (EIS), dated March 21, 2007, for the development and extension of runway 9R/27L and other associated airport projects at the Fort Lauderdale-Hollywood International Airport (FLL). The draft EIS, prepared by the Federal Aviation Administration (FAA), describes the environmental impacts associated with the airport projects proposed by the Broward County Board of County Commissioners (Broward County), which is the owner and operator of FLL.

According to the draft EIS, the existing airfield lacks sufficient capacity to accommodate the forecasted demand for its use under acceptable operating conditions. In order to address this need, Broward County has proposed: expansion and elevation of Runway 9R/27L; construction of an outer dual parallel taxiway that would be separated from the proposed north side parallel taxiway by 276 feet; construction of connecting taxiways from the proposed full-length parallel taxiway to existing taxiways; and construction of an Instrument Landing System (ILS) for landings on Runway 9R/27L. Runway 9R/27L would have a Category I ILS, which includes a Medium Intensity Approach Light System (MALSR) with runway alignment indicator lights, a localizer, and a glideslope. The proposed work will also include decommissioning of Runway 13/31 and redevelopment of a terminal gate.

The draft EIS presents an analysis of several on-site and offsite site alternatives, in addition to the no-action alternative. The FAA does not present a preferred alternative in the draft EIS, while Broward County's preferred alternative is presented. Broward County's preferred alternative (Alternative B1c) would impact approximately 15.41 acres of wetlands including 3.05 acres of estuarine emergent vegetation (mangroves), which are designated as EFH. Other alternatives presented (such as Alternative
D1) could adversely affect as much as 21.87 acres of wetlands.

The airport expansion activities are located in waters of the Unites States adjacent to the Dania cut-off canal and Atlantic Intracoastal Waterway (AIWW) in Broward County, Florida. Since 2001, this project has been reviewed in different versions in both EISs and Supplemental EISs with varying amounts of impacts proposed. The USACE has provided comments in the past regarding the need to avoid alternatives that were not the least environmentally damaging alternative that was still capable of satisfying the need for the project. In 2005, the FAA chose to restart the environmental analysis given Broward County's decision to pursue additional airside and landside planning studies in 2003 and 2004. As a result of these studies, a revised project was developed. In preparation of the present (fourth) draft EIS, the FAA has relied on the recent planning and technical studies completed by Broward County.

The USACE conducted a site visit to the project area with FAA, Broward County, NMFS, and environmental consultants for FAA on August 10, 2006. The wetland system at FLL consists of mangroves (red mangroves, white mangroves, black mangroves, and buttonwoods) with various degrees of infestation by Australian pine and Brazilian pepper. Mangroves in this area are tidally connected and provide nursery, foraging, and refuge habitat for other commercially and recreationally important fish and shellfish, such as snook, striped mullet, tarpon, and blue crab, and that the cumulative loss of mangroves has been extensive throughout Florida. These areas play an important role in the ecological function of South Atlantic estuarine ecosystems, particularly in regard to primary production and water quality. Further, mangroves in the project area indirectly support fishery habitat by controlling runoff and turbidity and by stabilizing sediment, ecological functions essential to supporting adjacent waters of the Dania cut-off canal and AIWW.

The draft EIS describes 11 offsite alternatives, 18 on-site alternatives, and the no action alternative. The FAA determined that the 11 offsite alternatives were not reasonable and therefore eliminated these alternatives from further evaluation. The FAA

determined that six of the on-site alternatives could meet the purpose established for the project. Of the six alternatives that the applicant determined would meet the project purpose and need, the impacts to EFH vary from 0.13 to 3.05 acres. Broward County's preferred alternative would directly impact 3.05 acres of mangroves.

An important issue for this project that I did not see addressed in the SEIS was the discussion of federal jurisdiction, which we discussed at the August 10, 2006 site visit. While not a formal jurisdictional determination, my notes from that day indicate the following:
W-8 appeared to be jurisdictional
W-17 a, b, and c appear to be jurisdictional W-25a & b (in which tidal exchange was observed) W-N3a and b did appear jurisdictional, but were of poor quality exotic impacted or part of a tree farm.
Based on the recent Rapanos ruling, a formal jurisdictional determination might alter this determination, but would not affect jurisdiction for the tidally influenced mangrove area which are also considered special aquatic sites.

We acknowledge and appreciate the substantial impact minimization that has occurred since the initial draft EIS review during 2001, which identified over 17 acres of wetlands could be impacted by the project. However, FAA's attention is drawn to the fact that the alternatives described will result in the need for a Department of the Army permit under section 404 of the Clean Water Act. The 404(b)(1) Guidelines are the environmental standards for Section 404 permit issuance under the CWA and these guidelines require that the project permitted be the Least Environmentally Damaging Practicable Alternative (LEDPA) that meets the project's purpose and need. A permit cannot be issued, therefore, in circumstances where a less environmentally damaging practicable alternative for the proposed discharge exists (except as provided for under Section 404(b)(2)). As there are three alternatives identified which meet the stated need, the USACE would recommend that FAA choose as its preferred alternative the one that is also the LEDPA. It should be noted that alternative C1, results in 15.4 acres of impacts that are almost entirely to very low quality exotic impacted wetlands (11.54 acres), which are only partially jurisdictional, or tree farms (3.72 acres), with no impacts to mangroves.

Important considerations:
Avoidance.4 Section 230.10(a) allows permit issuance for only the least environmentally damaging practicable alternative. 5 The thrust of this section on alternatives is avoidance of impacts. Section 230.10(a) requires that no discharge shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact to the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. In addition, Section 230.10(a)(3) sets forth rebuttable presumptions that 1) alternatives for non-water dependent activities that do not involve special aquatic sites 6 are available and 2) alternatives that do not involve special aquatic sites have less adverse impact on the aquatic environment. Compensatory mitigation may not be used as a method to reduce environmental impacts in the evaluation of the least environmentally damaging practicable alternatives for the purposes of requirements under Section 230.10(a).

Minimization. Section 230.10(d) states that appropriate and practicable steps to minimize the adverse impacts will be required through project modifications and permit conditions. Subpart H of the Guidelines describes several (but not all) means of minimizing impacts of an activity.

Thank you very much for this opportunity to comment.

Leah Oberlin
Environmental Engineer
Palm Beach Gardens Regulatory Office
South Permits Branch
4400 PGA Blvd, Suite 500
Palm Beach Gardens, FL 33410
Phone: 561-472-3506 Fax: 561-626-6971

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DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
4400 PGA Boulevard, Suite 500
Palm Beach Gardens, FL 33410

REPLY TO
ATTENTION OF

0 6 MAR 2008

Palm Beach Gardens Regulatory Section
Fort Lauderdale-Hollywood
International Airport Draft EIS
SAJ-1995-4561

Virginia Lane
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822-5024

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Sincerely,

Tori K. White

Tori K. White
Chief, Palm Beach Gardens
Permits Section

Enclosures

Copies Furnished:

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Fort Lauderdale-Hollywood International Airport
Environmental Impact Statement and Permitting

Agency Consensus Form

☒ Fort Lauderdale-Hollywood International Airport Runway 9R/27L Extension Project EIS

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Please check one:

☒ My signature indicates that

Jon Whites USACE 6 Mar 08
Name/Agency/Date

has achieved Consensus with the FAA on the above Consensus Point.

☐ My signature indicates that

_____
Name/Agency/Date

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Comments(please attach additional pages as necessary):

_____

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_____

Oberlin, Leah A SAJ

From: Oberlin, Leah A SAJ
Sent: Tuesday, July 17, 2007 9:00 AM
To: 'Virginia.Lane@faa.gov'
Subject: Ft. Lauderdale Airport Expansion DSEIS

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Thank you very much for this opportunity to comment.

Leah Oberlin
Environmental Engineer
Palm Beach Gardens Regulatory Office
South Permits Branch
4400 PGA Blvd, Suite 500
Palm Beach Gardens, FL 33410
Phone: 561-472-3506 Fax: 561-626-6971

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, FL 33701
727.824.5312, FAX 824-5309
http://sero.nmfs.noaa.gov

MAR 24 2008

F/SER31:MCB

Ms. Virginia Lane
Orlando Airports District Office
Federal Aviation Administration
Department of Transportation
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822

Dear Ms. Lane:

This responds to your letter dated February 5, 2008, requesting National Marine Fisheries Service (NMFS) concurrence with your determinations pursuant to section 7 of the Endangered Species Act (ESA) for the Department of Transportation's (DOT) proposed expansion of Runway 9R/27L at Fort Lauderdale-Hollywood International Airport. You determined the project may affect, but is not likely to adversely affect, smalltooth sawfish and requested our concurrence. NMFS' determinations regarding the effects of the proposed action are based on the description of the action in this informal consultation. You are reminded that any changes to the proposed action may negate the findings of the present consultation and may require reinitiation of consultation with NMFS.

The project is located at Fort Lauderdale-Hollywood International Airport at latitude 26.07113°N, longitude 80.16106°W, in Broward County, Florida. The applicant proposes to expand an existing runway by lengthening it from 5,276 to 8,000 feet and widening it from 100 to 150 feet. Additionally, several adjacent taxiways and an instrument landing system for Runway 9R/27L will be constructed. Approximately 3.85 acres of mangrove habitat would be impacted as a result from fill, erosion, sedimentation, and clearing of vegetation associated with the proposed expansion project using land-based equipment. The applicant has agreed to use turbidity controls and comply with NMFS' March 23, 2006, *Sea Turtle and Smalltooth Sawfish Construction Conditions*. A project of this size and scope is expected to take over a year to complete.

Smalltooth sawfish, a species protected by the ESA, can be found in or near the action area and may be affected by the project. There is no designated critical habitat in or near the project area.

This project may potentially affect smalltooth sawfish as a result of degradation and/or loss (e.g., temporary loss as a result of avoidance due to construction noise and/or extended loss due to clearing of vegetation) of mangrove habitat utilized by juvenile specimens for refuge, to the extent the species currently utilizes such habitat in the area. The relatively low-intensity construction noise associated with the proposed project (i.e., upland construction activity) may result in an avoidance reaction (i.e., disruption of normal behavioral patterns). This avoidance reaction may prevent sawfish from utilizing potential refuge habitat within the project area. However, avoidance reaction due to noise is expected to be insignificant based on the proximity of the impacted habitat to the airport and other urban development (e.g., Interstate I-95), in that the project area is currently exposed to significant noise impacts, and additional construction noise will likely be insignificant when scaled against ambient aircraft noise. Additionally, the potential elimination of 3.85 acres of mangrove habitat will have insignificant effects on smalltooth sawfish due to the presence of abundant (>1,200 acres) mangrove habitat in the immediate vicinity of the project site. Field surveys conducted by the applicant indicate that the mangrove areas to be impacted are of much lower quality compared to other mangrove habitat in the nearby vicinity, due to lack of sufficient water levels, and presence of debris and exotic plant species. Based on the above, NMFS concludes that smalltooth sawfish are not likely to be adversely affected by the proposed action.

This concludes your consultation responsibilities under the ESA for species under NMFS' purview. Consultation must be reinitiated if a take occurs or new information reveals effects of the action not previously considered, or the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat in a manner or to an extent not previously considered, or if a new species is listed or critical habitat designated that may be affected by the identified action. We have enclosed additional information on other statutory requirements that may apply to this action, and on NMFS' Public Consultation Tracking System, which will allow you to track the status of ESA consultations. If you have any questions, please contact Michael Barnette at (727) 551-5794 or by e-mail at Michael.Barnette@noaa.gov.

Sincerely,

Roy E. Crabtree, Ph.D.
Regional Administrator

Enclosure

File: 1514-22.f.1.FL
Ref: I/SER/2008/00504

Additional Considerations for ESA Section 7 Consultations (Revised 01-18-2008)

Marine Mammal Protection Act (MMPA) Recommendations: The Endangered Species Act (ESA) section 7 process does not authorize incidental takes of listed or non-listed marine mammals. If such takes may occur an incidental take authorization under MMPA section 101 (a)(5) is necessary. Contact Ken Hollingshead of our NMFS Headquarters' Protected Resources staff at (301) 713-2323 for more information on MMPA permitting procedures.

Essential Fish Habitat (EFH) Recommendations: In addition to its protected species/critical habitat consultation requirements with NMFS' Protected Resources Division (PRD) pursuant to section 7 of the ESA, prior to proceeding with the proposed action the action agency must also consult with NMFS' Habitat Conservation Division (HCD) pursuant to the Magnuson-Stevens Fishery Conservation and Management Act's (MSA) requirements for essential fish habitat (EFH) consultation (16 U.S.C. 1855 (b)(2) and 50 CFR 600.905-.930, subpart K). The action agency should also ensure that the applicant understands the ESA and EFH processes; that ESA and EFH consultations are separate, distinct, and guided by different statutes, goals, and time lines for responding to the action agency; and that the action agency will (and the applicant may) receive separate consultation correspondence on NMFS letterhead from HCD regarding their concerns and/or finalizing EFH consultation.

Public Consultation Tracking System (PCTS) Guidance: PCTS is an online query system allowing federal agencies and U.S. Army Corps of Engineers' (COE) permit applicants to track the status of NMFS consultations under ESA section 7 and under MSA sections 305(b)2 and 305(b)(4): Essential Fish Habitat. Access PCTS via: www.nmfs.noaa.gov/pcts. Federal agencies are required to enter an agency-specific username and password to query the Federal Agency Site. The Corps Permit Site allows COE permit applicants the ability to check on the current status of Clean Water Act section 404 permit actions for which NMFS has conducted an ESA section 7 consultation with the COE since the beginning of the 2001 fiscal year (no password needed).

For COE-permitted projects, click on "Enter Corps Permit Site." From the "Choose Agency Subdivision (Required)" list, pick the appropriate COE district. At "Enter Agency Permit Number" type in the COE district identifier, hyphen, year, hyphen, number. The COE is in the processing of converting its permit application database to PCTS-compatible "ORM." An example permit number is: SAJ-2005-000001234-IPS-1. For the Jacksonville District, which has already converted to ORM, permit application numbers should be entered as SAJ (hyphen), followed by 4-digit year (hyphen), followed by permit application numeric identifier with no preceding zeros. E.g., SAJ-2005-123, SAJ-2005-1234, SAJ-2005-12345.

For inquiries regarding applications processed by Corps districts that have not yet made the conversion to ORM (e.g., Mobile District), enter the 9-digit numeric identifier, or convert the existing COE-assigned application number to 9 numeric digits by deleting all letters, hyphens, and commas; converting the year to 4-digit format (e.g., -04 to 2004); and adding additional zeros in front of the numeric identifier to make a total of 9 numeric digits. E.g., AL05-982-F converts to 200500982; MS05-04401-A converts to 200504401. PCTS questions should be directed to Eric Hawk at Eric.Hawk@noaa.gov. Requests for username and password should be directed to PCTS.Usersupport@noaa.gov.

RECEIVED JUL 28 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 25, 2008

Ms. Virginia Lane
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, FL 32822-5024

SUBJ: EPA NEPA Comments on FAA's FEIS for the "Development and Expansion of Runway 9R/27L and Other Associated Airport Projects at Fort Lauderdale-Hollywood International Airport" (FLL); Broward County, FL; CEQ #20080244; ERP #FAA-E51052-FL

Dear Ms. Lane:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced FAA Final Environmental Impact Statement (FEIS) on the proposed expansion of FLL in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. EPA has participated in FAA's scoping meeting and site visit on February 23, 2005, and provided follow-up scoping comments in a letter dated March 25, 2005. We have also provided NEPA comments on the Draft EIS (DEIS) in a letter dated May 17, 2007. EPA appreciates FAA's coordination with us during scoping and between the DEIS and FEIS.

The existing FLL footprint includes a 9,000-ft long by 150-ft wide primary "north" runway (9L/27R), a 5,276-ft long by 100-ft wide "south" runway (9R/27L), and an intersecting 6,930-ft long by 150-ft wide crosswind runway (13/31). Onsite expansion of these runways or construction of new ones presents several off-airport physical constraints adjacent to airport property. These include US 1 and the FEC Railroad (eastward); I-95, the CSX Railroad and Dania Cut-off Canal (westward); I-595 (northward); and residential areas (southward and westward).

FAA's Preferred Alternative

FAA's preferred alternative for the proposed FLL expansion is Alternative B1b, which is structurally the same as Broward County's (Sponsor) Proposed Project (B1c) identified in the DEIS, but without the operational mitigative measures that are currently in effect through Interlocal Agreements (flight tracks, etc.). B1b proposes to extend the south runway (9R/27L) eastward toward the Atlantic Ocean to a total of 8,000 ft in length (+2,724-ft extension) by 150 ft in width (+50-ft extension). This runway extension would require construction of a "runway/taxiway bridge" to span US 1 and the FEC Railroad. To provide adequate vertical clearance (34.74 ft minimum) over this

transportation corridor, the runway would need to be elevated 45 ft MSL on the east end (27L) and 8 ft MSL on the west end (9R). Because the runway would be inoperable during construction, a parallel taxiway just north of the south runway would serve as an interim runway. Various other project modifications are also proposed, including terminal redevelopment and decommissioning of the crosswind runway. The earliest expected implementation of B1b would be 2012, such that the analysis design years are 2012 and 2020. FAA and the Sponsor considered a full range of reasonable onsite alternatives in the EIS to expand the south runway ('B' alternatives), north runway ('C' alternatives) or a combination ('D' alternatives).

Air Quality Impacts

FLL is identified as one of the busiest U.S. airports, as a congested airport, and as one that is significant to national air transportation. Consistent with the "Vision 100" statute to streamline the review of such FAA-designated congested airports, FAA developed an FLL Steamlining Memorandum of Understanding (MOU) with EPA and other cooperating agencies to better coordinate the EIS review. From a project need perspective, the FLL expansion is to prevent lengthy aircraft departure delay times (predicted to reach an average of approximately 26 minutes in 2012/2020) and to maintain average delays at six minutes per operation (pg. ES-10). Such a reduction in aircraft queuing time would also save energy and reduce aircraft air emissions such as National Ambient Air Quality Standards (NAAQS) criteria pollutants, Hazardous Air Pollutants (HAP) and Greenhouse Gases (GHG). EPA supports this air quality improvement aspect of the FLL expansion, although continued increases in operations at FLL over time can be expected to diminish this environmentally beneficial aspect.

In addition to this reduction in aircraft emissions, EPA continues to recommend overall airport reductions in GHG through the various measures outlined in our DEIS comment letter (alternative fuels, ground support equipment, auxiliary power units, electrification, idling practices, diesel retrofits, cell phone waiting areas, energy conservation, etc.). Although we appreciate that a HAP inventory for airport sources was provided in this FEIS for FLL, we continue to recommend that screening level HAP risk evaluations be prepared in order to allow an informed comparison of the alternatives based on their respective potential impacts. It is recommended that such risk comparisons become part of FAA policy so that the alternative airport scenarios will be better evaluated. Also regarding air quality, our DEIS concern that the proposed project would result in a violation of the $PM_{2.5}$ NAAQS has been resolved. The project is predicted to be in compliance with all NAAQS for 2012 and 2020 design years.

Noise Exposure Impacts

Despite project air quality benefits, aircraft noise exposure to nearby residents remains an EPA concern. It is EPA's primary concern with the proposed FLL expansion and merits mitigation. Of primary concern is new and increased (as well as existing) noise exposure of residents within the 65+ DNL contours (as well as the 60 DNL contour)

located south and west of the south runway proposed for extension by the FAA preferred alternative B1b.

Affected Public

For 2012, noise exposure to residents within the 65 DNL by B1b were reported (pg. 6.C-23) to affect 652 residential housing units (371 single-family, 233 multi-family and 48 mobile home units) and 1,593 people (3 people in 1 unit within 70-75 DNL and 1,590 people in 651 units within 65-70 DNL). In addition, 8,297 people in 3,650 units would be located within the 60-65 DNL in 2012. Residential areas with an undetermined portion (no 2012 data found in the FEIS[1]) of these 8,297 people in the 60-65 DNL was presumably also considered incompatible land use by FAA since they constitute the outside adjacent portion (i.e., outside of the 65 DNL) of contiguous residential neighborhoods and subdivisions that are otherwise located within the 65 DNL. A portion (3,482 people) of these 8,297 people within the 60-65 DNL would also experience a significant noise elevation (+3.0 DNL or greater) in 2012 due to the implementation of B1b (pg. 6.C-53).

For 2020, the continued operation of B1b would affect a greater population. Data for 2020 (pg. 6.C-72) showed noise exposure of 1,051 residential dwelling units (571 single-family, 390 multi-family, and 90 mobile home units) and 2,472 people (127 people in 51 units within 70-75 DNL and 2,345 people in 1,000 units within 65-70 DNL). In addition, 9,749 people in 4,234 units would be located within the 60-65 DNL in 2020. Of these, residential areas with approximately 2,184 people in 1,023 units (527 single-family, 218 multi-family and 278 mobile home) were also considered incompatible land use by FAA since they constitute the outside adjacent portion (i.e., outside of the 65 DNL) of contiguous residential neighborhoods and subdivisions that are otherwise located within the 65 DNL (pg. 8-38). A portion (3,802 people) of these 9,749 people within the 60-65 DNL would also experience a significant noise elevation (+3.0 DNL or greater) in 2020 due to the implementation of B1b (pg. 6.C-103).

EPA's DEIS Noise Mitigation Recommendations

In our May 17, 2007, comment letter on the DEIS, EPA outlined our recommendations for noise mitigation. In addition to any safe and FAA-approved operational mitigation measures (flight tracks to minimize low residential overflights), we continue to recommend land use mitigation (primarily home acquisitions from willing sellers) in the following prioritized approach for FLL (excerpted from DEIS comment letter):

* Acquisition of all homes from willing sellers that are located within the 70+ DNL contours;
* Acquisition of all remaining homes from willing sellers that are located within the 65+ DNL contours and are significantly elevated (using the

[1] It is our understanding from FAA that such data were only calculated for 2020 (2,184 people) and not 2012, since FAA noise mitigation was based on the 2020 noise condition and it was assumed the 2012 noise exposures would be covered in the 2020 mitigation.

+1.5 DNL criterion);

* Acquisition of all remaining homes from willing sellers that are located within the 65+ DNL contours, or sound-proofing those homes at the option of the residents;
* Consideration of sound-proofing all homes at the option of the residents that are located within the 60 DNL contour and are significantly elevated (using the +3.0 DNL criterion).

FAA's Noise Mitigation Proposal

In the FEIS (Chapter 8.6.1), the Broward County Sponsor proposed "...seven noise mitigation principles for FAA to consider in the development of conceptual mitigation for the EIS" (pg. 8-23). These principles include property acquisition, soundproofing, avigation easements and other measures. FAA has selected four of these measures as "appropriate to address incompatible land uses within the 2020 65 DNL noise contour of the FAA's preferred alternative" (pg. 8-27). These mitigation measures are identified on page 8-28 and may be generalized as addressing: 1) neighborhoods/subdivisions as a whole to help ensure community cohesion, 2) acquisition of mobile homes and relocation of residents, 3) sound insulation of eligible single- and multi-family units with recommended avigation easements, and 4) purchase guarantee/sales assistance (with sound insulation and recommended avigation easements) for eligible single- and multi-family units. The FEIS also predicts the cost of implementing various measures based on the number of potentially eligible incompatible units within the 65 DNL (571 single-family, 390 multi-family and 90 mobile home units) and in those portions of the 60 DNL where contiguous neighborhoods cross the 65 DNL contour (pg. 8-38).

Regarding the procedures for implementing FAA's noise mitigation measures, page 8-27 states that (excerpted from FEIS):

> The FAA will identify those properties that may be eligible for participation in a land use mitigation measure. Broward County's responsibility is to decide how to apply the mitigation to eligible properties. The mitigation areas and the mitigation measures identified in this EIS will be part of the FAA Record of Decision. The Record of Decision will include conditions requiring the Airport Sponsor to implement the noise mitigation measures addressing the impacts resulting from the FAA's Preferred Alternative. The participation of the individual home owner and/or property owner in any of the recommended mitigation measures, however, will be voluntary.

EPA's Comments & Recommendations

We appreciate the progress that the Sponsor and FAA have made in the development of a noise mitigation plan and that FAA's four mitigation measures incorporate some of EPA's recommendations outlined above. Together with our noise mitigation recommendations, we believe that FAA's four noise mitigation measures is a workable

approach for completion of FAA's final mitigation plan. We offer the following comments on FAA's mitigation measures for B1b:

- Overall Commitment – A clearer commitment that FAA's four referenced mitigation measures (or modification thereof into the FAA final noise mitigation plan with FLL Streamlining MOU cooperating agency input) *will be implemented*, as opposed to these measures being termed "appropriate", the "FAA-recommended mitigation measures", or that "[m]itigation and other conditions established in this EIS, or during its review, are subsequently committed to by the FAA in its Record of Decision"). (Ref: pp. 8-27, ES-34, ES-32)

- 65+ DNL Specifics & Commitment – Eligibility and the specifics as to what mitigation is actually proposed for the 1,593 (2012) and 2,472 (2020) affected residents within the 65+ DNL were deferred until the ROD and should be clarified for all residences, by mitigation measure, in the ROD. (Ref: Tables 6.C.1-13 (pg.6.C-23) and 6.C.1-44 (pg. 6.C-72))

- Contiguous Neighborhoods Specifics & Commitment – Eligibility and the specifics as to what mitigation is actually proposed for those residents that live outside of but adjacent to the 65 DNL in contiguous neighborhoods and subdivisions that cross the 65 DNL (2,184 people for 2020) which presumably were also deferred to the ROD and should be clarified, by mitigation measure, for all residences in the ROD. (Ref: Table 8-8 (pg. 8-38))

- 60 DNL Significant Elevation Mitigation & Commitment – Mitigation for the 3,482 (2012) and 3,802 (2020) residents that live within the 60-65 DNL that are predicted to be significantly elevated by +3.0 DNL or greater due to the project was not addressed. We believe that such residents should be considered for suitable noise exposure mitigation such as home soundproofing. The ROD should clarify with specifics and a commitment. (Ref: Tables 6.C.1-31 (pg. 6.C.-53) and 6.C.1-66 (pg. 6.C-103))

Moreover, as suggested above and consistent with the FLL Streamlining MOU associated with this project, cooperating agency signatories such as EPA are asked for concurrence or non-concurrence at various decision points – including mitigation – during the development of the EIS. While FAA coordinated with us throughout the NEPA process, concurrence of a final noise mitigation plan has not yet occurred. This step should occur *before* the issuance of the ROD to help insure a coordinated noise mitigation plan. While NEPA only requires that mitigation be considered, EPA believes that the public disclosure process would be better served if noise mitigation specificity and commitments are included in the FEIS as well as in the ROD.

Given that mitigation specificity was deferred to the ROD, we continue to recommend closer consideration and implementation of our above DEIS noise mitigation approach together with the above four FAA mitigation measures identified in the FEIS during the FAA development of the ROD. We further recommend individual application of the

final noise mitigation plan to all affected residents within the 65+ DNL contours and the 60-65 DNL contour. Such specifics include enumeration – by mitigation measure – of the eligible residents inside and outside the 65 DNL to whom the FAA/Sponsor will offer home and/or property acquisition, soundproofing, avigation easements, and other mitigation measures (i.e., how many residences/residents inside and outside the 65 DNL will be targeted for acquisition, soundproofing, etc.). Procedurally, it is our understanding from FAA that implementation of the noise mitigation plan would start with residences within the highest contours (70 DNL). Also, FAA's mitigation for noise exposures is based on the 2020 noise condition as opposed to the 2012 condition. Since the number residents exposed to aircraft noise is greater for the 2020 condition, EPA agrees with this procedural approach unless there are some eligible residents in the 2012 condition that would not be covered by the 2020 condition and its mitigation.

For the benefit of the public, we also recommend that the ROD be made available to all affected parties and participants of the EIS process so that the finalized version of what the Sponsor and FAA intend to do to mitigate aircraft noise at FLL for the proposed expansion will be well distributed to the public. Moreover, we suggest that the Sponsor and/or FAA conduct follow-up meetings to further coordinate the final noise mitigation plan with the affected residents to accommodate their individual needs.

Also related to noise mitigation, we understand from Appendix P (Response 8.9) that "Broward County is currently conducting a 14 CFR Part 150 Study" and "[t]he Record of Approval for the 14 CFR Part 150 is not anticipated before the FAA issues its Record of Decision (ROD) on this EIS." EPA commends the Sponsor for conducting its Part 150 Study and FAA for its funding; however, we wish to emphasize that the noise mitigation for the present FLL expansion EIS should fully mitigate its noise exposure impacts and not depend on the Part 150 process for such noise mitigation. The Part 150 process is a voluntary process intended to mitigate residual noise impacts that were left unmitigated by previous projects or that accrued incrementally between projects. However, the NEPA and Part 150 processes should complement each other to mitigate both existing and proposed noise exposure impacts at FLL.

Wetland Impacts

In addition to noise exposure, B1b would impact wetlands. Mitigation for unavoidable wetland losses (15.41 ac) should continue to be coordinated with the U.S. Army Corps of Engineers (COE), EPA and other resource agencies. We appreciate that the Sponsor and FAA included the conceptual wetland mitigation plan as part of the FEIS. Based on our review, we recommend the conceptual wetland mitigation plan include in-kind mitigation to offset impacts to freshwater wetlands or justify why out-of-kind mitigation is appropriate. Furthermore, we recommend that the Sponsor coordinate with the EPA and the other regulatory resource agencies to finalize the total amount and type of mitigation credits which may be available at the West Lake Park Mitigation site.

Other Comments

EPA has also reviewed FAA's responses to our comments on the DEIS. A copy of our letter ("AC001") and FAA's responses to our comments (pg. P.1-1) are provided in Appendix P. Our comments on selected responses are provided in the enclosed *Detailed Comments*.

Summary

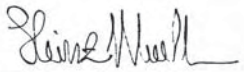
We appreciate the progress that the Sponsor and FAA have made in the development of a noise mitigation plan and that FAA's four mitigation measures identified in the FEIS incorporate some of EPA's recommendations outlined in EPA's NEPA comments on the DEIS. Together with our noise mitigation recommendations, we believe that the four noise mitigation measures that FAA finds "appropriate to address incompatible land uses within the 2020 65 DNL noise contour of the FAA's preferred alternative" is a workable approach for completion of FAA's final mitigation plan. However, specificity and commitments for the noise mitigation for residents living within and outside the 65 DNL were deferred to the FAA ROD. Cooperating agency concurrence with the mitigation plan, consistent with the FLL Streamlining MOU as a EIS concurrence point, was also deferred until after the FEIS, but should occur *before* the issuance of the ROD. Until a noise mitigation plan is finalized, EPA continues to have concerns about residents in nearby residential areas experiencing aircraft noise exposure due to the project.

EPA continues to recommend closer consideration and implementation of our DEIS noise mitigation approach together with the four identified FAA mitigation measures during the FAA development of the ROD. A clear mitigation plan should be developed in the ROD for all residents living within the 65 DNL contours as well as for those residents that may experience significant elevation within the 60-65 DNL. Specificity and commitments in the final noise mitigation plan of the ROD should include enumeration – by mitigation measure – of the eligible people living in residences inside and outside the 65 DNL to whom the FAA/Sponsor would offer home/property acquisition, soundproofing, avigation easements, and other mitigation measures. The priorities and timing of the mitigation should also be specified. We recommend that the ROD also be made available to all interested parties and the Sponsor and/or FAA should conduct follow-up public meetings to further coordinate the final noise mitigation plan with the affected residents to accommodate their individual needs. These EIS mitigative actions should complement – but be independent from – the Sponsor's ongoing Part 150 Study.

We appreciate FAA's coordination of this proposed project with us. Because of the noise mitigation specifics to be included in the ROD, we request a copy of the ROD for our files. Should you have overall questions on our comments, feel free to coordinate with Chris Hoberg of my staff at 404/562-9619 or hoberg.chris@epa.gov. Also, air quality issues may be directly addressed to Brenda Johnson of our Air, Pesticides and Toxics Management Division (APTMD: 404/562-9037 or johnson.brenda@epa.gov),

air toxics issues to Paul Wagner (APTMD: 404/562-9100 or wagner.paul@epa.gov), and wetland issues to Ron Miedema (South Florida Office: 561/616-8867 or miedema.ron@epa.gov).

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosure – *Detailed Comments*

DETAILED COMMENTS

EPA offers these remaining comments on the following selected FAA responses found in Appendix P of the FEIS.[2]

▸ FAA Response 4.3 (Touchdown Point) – EPA defers to FAA and the Sponsor regarding the touchdown point of the proposed runway as well as other aspects of airport safety. However, we do not suggest that the touchdown point (striped on the runway) be located directly over US 1 to minimize the startle effect of motorist (particularly tourist motorists new to the area) traveling through the proposed US 1 "tunnel" when aircraft are landing on the runway/taxiway bridge directly overhead. Even though Response 4.3 suggests that the touchdown point should appropriately be addressed in the project design phase, we believe this is too late since by then the length and configuration of the runway is already set in the ROD and the touchdown point is presumably a defined FAA standard distance from the end of the runway.

Our experience with the recent EIS for the fifth runway expansion of Hartsfield-Jackson Atlanta International Airport (ATL), which has a similar runway bridge over an interstate highway, was that the touchdown point was not directly over the highway. Instead, the touchdown point – and therefore most landings – occurred earlier such that aircraft had already landed and could roll across the runway bridge rather than land directly over the highway. This would seem less startling to motorists, especially if additional screening of the runway bridge from the highway perspective was provided. Locating the stress point of the touchdown on fill versus bridge portions of the runway would also be sound from an engineering standpoint.

▸ FAA Response 4.6 (RPZs) – Again, EPA defers to FAA and the Sponsor regarding airport safety. However, it is unclear how I-95 can be located within the Runway Protection Zone (RPZ) since it is an *elevated* highway. It is our understanding that RPZs are to be clear zones intended to "enhance the safety for aircraft operations" (pg. xii) for emergencies such as aircraft overshooting the end of the runway.

▸ FAA Response 7.3 (HAP) – We note that Chapter 6, Section 6.B (*Air Quality*), page 6.B-102 mid-paragraph, states that "[t]he NAAQS comparative assessment provides the analysis that translates the emission inventories into pollutant concentrations for comparison to the NAAQS." A similar approach is warranted to estimate the potential impacts from HAP. An emission inventory of HAP sources is a foundation. HAP emissions should be evaluated using dispersion modeling and toxicity values in a screening level assessment for locations in the vicinity of the airport. While we do not have national ambient air quality standards to serve as benchmarks for HAP, a screening

[2] EPA can appreciate the organizational problems associated with the voluminous comments received by FAA on the DEIS and the need to summarize or "bundle" similar comments for a streamlined response. However, the process of matching the responses to our numbered comments would have been more user-friendly if EPA (and any other commenters providing the same general comment) had been identified in the bundled comment.

level analysis can identify potential health risks that can be compared with acceptable risk ranges. EPA does not concur with FAA that "scientific uncertainties and lack of established standards and methodologies" justifies eliminating a screening level analysis from the information that should be presented in the FEIS.

▸ FAA Responses 7.4 & 7.15 (GHG) – These two FAA responses appear to be contradictory. That is, Response 7.4 states that "[a]lthough strategies to reduce emissions at the airport could be implemented as part of the Airport's overall environmental awareness plan, such a plan or strategies of a plan that could reduce emissions were not discussed in the EIS because the project already reduces emissions" and "[t]herefore, no plans to minimize or mitigate air quality impacts are necessary or required." In contrast, Response 7.15 states that "[t]he FAA is seeking more guidance from the U.S. Environmental Protection Agency (USEPA) on how to address greenhouse gas (GHG) emissions, particularly carbon dioxide emissions, at airports." EPA suggests that the proposed FLL expansion offers an excellent opportunity for further "greening" of the airport by reducing GHGs. EPA appreciates that – as also stated in Response 7.15 – some GHG reduction actions (coordination, studies, guidance, etc.) are ongoing within FAA.

For FLL, EPA continues to recommend the following actions excerpted from our DEIS comment letter of May 17, 2007. We recommend consideration of these programs and approaches that could be used to minimize or mitigate the air quality impacts from airport emissions (EPA Region 4 technical assistance is available through Dale Aspy at 404/562-9041 or aspy.dale@epa.gov):

* Electrification of all contact gates and ground support equipment (GSE), especially for terminal redevelopment;
* Use of auxiliary power units (APU) by aircraft at gates;
* Use of alternative fuels (such as compressed natural gas: CNG), electricity and diesel retrofits for airport shuttle buses and other on-airport vehicles;
* Use of reduced idling practices, cleaner fuels (such as biodiesel), and emission retrofits for diesel construction equipment used by FAA contractors;
* Use of more recent concepts such as "cell phone waiting areas" to minimize circling or idling traffic for passenger pick-ups;
* Use of other innovative approaches to avoid or minimize emissions from mobile and stationary sources associated with airports and its traffic;
* Promotion (e.g., airport practices and signage) of increased awareness of greenhouse gases (GHG) relative to their effects on climate change and their reduction through energy conservation, alternative fuels and biofuels use, and reduced vehicular mileage and fuel strategies.

▸ FAA Response 7.27 (HAP) – EPA does not concur that airport expansion alternatives cannot be evaluated in an EIS based on potential health effects. FAA's rationale for its position seems to be that a single source (or collection of sources such as an airport) would be difficult to evaluate at a local level given the many other sources that could affect a neighborhood. For the purposes of an EIS, the alternatives can be compared with

one another regardless of other sources that may exist. EPA offers advice on how to do such an evaluation in the Air Toxics Risk Assessment Reference Library which is available at http://www.epa.gov/ttn/fera/risk_atra_main.html.

▸ FAA Responses 8.1 & 8.2 (New Noise Exposures) – Response 8.1 indicates that new residents would be exposed to noise even by the No Action Alternative. EPA does not consider this relevant to the need for airport noise mitigation. That is, we believe the Sponsor and FAA are responsible for mitigating substantive aircraft noise exposures of residents within the 65+ DNL contours and for significant increases (as defined by the Federal Integrated Committee on Noise: FICON) within and outside the 65+ DNL contours. Mitigation should be addressed in response to proposed projects (NEPA documents) and periodically for substantive incremental increases between projects (Part 150 Program or other means). Also, while the noise information cited in Response 8.2 (Section 6.C.1) includes excellent documentation of the residences located in project noise exposure areas inside and outside the 65 DNL, it does not necessarily identify the requested enumeration of the *new* residences affected by noise (within the 65 DNL or significantly elevated within the 60 DNL) by the preferred alternative B1b (or those residences that would perhaps no longer be affected).

▸ FAA Response 8.6 (D1 & D2) – We appreciate that FAA has provided a full range of onsite alternatives. However, the fact that Alternatives D1 and D2 would not be fully constructed or operational by the 2012 design year makes their selection unlikely for a "Vision 100" project that emphasizes streamlined relief from long airport departure delay times. We nevertheless agree that these alternatives, which combine construction of both the north and south runways, should have been considered at some level within the NEPA document.

▸ FAA Response 8.8 & 8.10 (2020 Noise Data) – We much appreciate the addition of the requested 2020 noise data (Table 6.C.1-66: pg. 6.C-103) for significant elevations within the 60 and 65 DNL contours that were not presented in the DEIS. This table complements Table 6.C.1-31 for 2012 presented in the DEIS and the FEIS (pg. 6.C.-53). We note that these data show that in addition to some residences being significantly elevated (per the +1.5 DNL or greater FICON criterion) within the 65 DNL contours, some residences within the 60 DNL contour would also be significantly elevated (per the +3.0 DNL or greater FICON criterion). While those residences in the 65 DNL contours would presumably be mitigated, we believe that residents significantly elevated in the 60 DNL contour should also be considered for suitable noise exposure mitigation such as soundproofing.

▸ FAA Response 10.1 & 10.6 (Wetland mitigation) – We appreciate that the Conceptual Wetland Mitigation Plan is addressed in Appendix M.3 and look forward to reviewing and providing comments on the detailed mitigation plan when it becomes available.

▸ FAA Response 10.5 (Biscayne Aquifer) – This response does not specifically refer to the prevention of the contamination of the Biscayne Aquifer – a sole source aquifer – although compliance with NPDES permitting and the Stormwater Pollution Prevention

Plan (SWPPP) would certainly be beneficial to aquifer water quality. Other factors to consider would be the shallow depth of the Biscayne Aquifer in the Ft. Lauderdale area and the use of containment basins for any surface petroleum storage tanks or refueling stations. Also, as indicated in this response, we are aware that EPA authorized the NPDES program to the State of Florida; however, for completeness, the response should have also indicated that EPA retains federal oversight of the program.

▸ FAA Response 13.1 (EJ) – We appreciate that socioeconomics, children's health and EJ were addressed in Section 5.H.1.

* *EJ*: Page 5.H-5 compares the study area to Broward County, which was identified as the "reference population" used in the EJ analysis and was "...determined by FAA to be the appropriate unit of geographic area under analysis." We note that the minority and low-income populations compare well within these areas. However, although requested in our DEIS comments, additional comparison to adjacent counties and the State of Florida were not found. Such comparisons would have shown if Broward County represented a concentration of minorities or low-income populations, or if the demographics of Broward County was similar to neighboring Dade, Palm Beach, Hendry and Collier Counties (alternatively, smaller geographic units could be used such as U.S. Census (2000) Block Groups (BG) adjacent to the BG(s) incorporating the FLL 65 DNL contours). Accordingly, this information would have determined if FLL was an area with relatively comparable, elevated or reduced EJ populations within the region. As such, these demographics would have helped determine if the impacts of the proposed FLL expansion (e.g., noise exposure) would or would not be a potentially disproportionate impact in the region. Therefore, FAA should consider neighboring demographics in the development of its ROD and also provide an overall EJ conclusion, which is currently missing in Section 5.H.1.2.

* *Children's Health*: The FEIS indicates that the main concern for children statewide is asthma and respiratory diseases (ailments that are effected by air quality). Page 5.H-8 also states that "[w]hile this air quality analysis does not address a specific population, it is assumed that if *de minimis* thresholds are not exceeded there would be no significant adverse effect on children populations resulting from the implementation of the Airport Sponsor's Proposed Project or its alternatives." Since the *de minimis* levels of the NAAQS are not predicted to be exceeded, EPA notes that there should be no significant adverse effect on children health related to the six criteria pollutants (screening level HAP risk evaluations were not determined). The primary NAAQS set limits that are designed to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly.

However, despite the air quality considerations, page 5.H-8 does not consider the impacts of aircraft noise exposure on children's health. In future FAA EISs, this impact should be considered for major airport expansions or new construction projects. Based on our independent review, EPA notes that there appear to be no schools or noise sensitive public facilities frequented by children in the immediate project area. This information should have been captured or referenced in this section of the document.

* *Socioeconomics*: Page 5.H-5 briefly describes FAA Order 5050B, Airport Environmental Handbook and the social and economic impacts that were considered as part of this project. In addition, the FAA policy and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act regarding fair compensation for residential and business displacement and related relocation assistance was also described. However, this section does not quantify residential or business relocations, or provide the demographic characteristics of those that will be displaced. Other issues, such as disruptions of established communities are also not discussed. If this information is located in other sections of the FEIS, it should be referenced in this section. If not, this information should be summarized in the ROD.

▸ FAA Responses 14.1 & 14.2 (Cumulative Impacts) – EPA appreciates that Chapter 7 was dedicated to cumulative impacts and was modified for the FEIS.

We note that certain FLL operational changes have already been approved by FAA in an Environmental Assessment/Finding of No Significant Impact (EA/FONSI) prepared concurrently with the present EIS (*Proposed Use of Runways 9R/27L and 13/31 When the Preferred Runway Cannot Efficiently Accommodate existing Operations at the Fort Lauderdale-Hollywood International Airport*). Although we acknowledged receipt of the document, EPA has deferred NEPA comments on the draft and final EA until this review of the FEIS for the FLL expansion.

To the extent feasible, EPA recommends that other airport actions occurring in a similar timeframe as an EIS project at the same airport should be lumped into one EIS so their impacts can be cumulatively considered. For dynamic airports like FLL, EIS actions may be frequent enough to allow this. However, when an EA action is necessary between EISs (e.g., it has independent utility or its implementation would be beneficial before the next airport EIS action) or has separate funding, the project and its EA should still be given adequate public review. Moreover, the direct/indirect impacts of such actions should also be summarized in subsequent NEPA documents in a cumulative impacts section (i.e., past, present and reasonably foreseeable project impacts on the same resources within the project area). EPA also believes that incremental increases in impacts (e.g., incremental noise increases and "creeping" expansion of noise contours over time) should periodically be assessed even if an airport project EA or EIS is not being proposed. Such incremental increases would also have a cumulative effect.

Among the numerous on-airport and off-airport projects documented in Chapter 7, we are pleased to note that page 7-15 documents the referenced EA/FONSI. The purpose of the operational modification was to already reduce congestion at FLL before the present FLL expansion project. The purpose of the EA/FONSI was to document potential impacts of this action. Since a FONSI was issued, FAA did not consider impacts significant. However, in the cumulative impacts analysis, a brief description of the positive or negative environmental impacts would have been appropriate for this project, as well as for the others similarly discussed.

More importantly, the focus of the cumulative impacts section should be to determine and document how the nearby past, present and foreseeable future projects (on-airport and off-airport) would affect (negatively or positively) relevant resources together with the proposed FLL expansion. The primary impacts of the proposed FLL expansion appear to be noise, air quality and wetlands such that the resources of primary concern would be the FLL noise environment, airshed, wetlands and perhaps others like Essential Fish Habitat (EFH). We therefore appreciate that Table 7.1 documents impacts of off-airport projects to wetlands and EFH and provides comments on mitigation. For air quality (pg. 7-21), the emphasis in the FEIS appeared to be on on-airport projects. Additional quantitative or qualitative discussion of off-airport sources or projects (e.g., emissions from Port Everglades cruise and container/tanker vessels, overall motor vehicular traffic, nearby power plants, etc.) relative to overall Broward County air quality would have been appropriate. For noise (pg. 7-22), on-airport projects were also emphasized, although off-airport projects were addressed by the conclusion that "…there were no noise impacts associated with the other projects disclosed in this chapter" (pg. 7-23). While it is certainly plausible that airport aircraft would generate most of the local noise and could essentially mask other sources (particularly during single-events like takeoffs), other important off-airport noise sources do exist locally. These include vehicular traffic, trains, cruise and container/tanker vessels, dredging and construction activities, and others. As such, most of the other off-airport projects discussed in Chapter 7 would have a noise component, although presumably less locally and regionally significant than the airport.

▸ FAA Response 22.2 (HAP) – There are a number of comments that EPA offered concerning the DEIS, that were identified in Appendix P of the FEIS with the number 22.2. Response number 22.2, on page P.22-1 of the FEIS, indicates that the text in the FEIS has been revised according to our comments. However, for some of these comments, the text was not changed in the FEIS. The ROD should address these.

▸ FAA Response 22.3 (Induced Impacts) – This response is to EPA's DEIS discussion that a lag time may exist between the induced impacts of the FLL expansion and supporting infrastructure (e.g., traffic intersection may not be upgraded immediately to accommodate additional airport-related traffic such that air quality could be reduced). However, EPA's comment was dismissed as an "opinion". While we realize that FAA may have little control over local traffic upgrades, this response could have been better addressed by referring to Broward County's economic impact study in Section 5.H.2 on *Secondary (Induced) Impacts*, or acknowledging that the FLL expansion could induce further local growth which in turn would have its own additional developmental impacts.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

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July 25, 2008 F/SER4:JK/pw

Virginia Lane
Environmental Specialist
U.S. Department of Transportation
Federal Aviation Administration
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Dear Ms. Lane:

NOAA's National Marine Fisheries Service (NMFS) reviewed the final Environmental Impact Statement (EIS), dated June 17, 2008, for the development and extension of runway 9R/27L and other associated projects at Fort Lauderdale-Hollywood International Airport (FLL). The final EIS prepared by the Federal Aviation Administration (FAA) describes the environmental impacts associated with airport projects proposed by the Broward County Board of County Commissioners (Broward County), owner and operator of FLL. According to the final EIS, the existing airfield at FLL lacks sufficient capacity to accommodate existing and forecasted demand. In order to address this need, Broward County proposes to: Redevelop Runway 9R/27L to a length of 8,000 feet and a width of 150 feet. An Engineered Materials Arresting System (EMAS) would be used at each runway end in place of a standard runway safety area. The use of EMAS allows the overall length of the runway to be reduced to 8,000 feet and would eliminate the need for declared distance while improving the runway operational capability. The eastern end of Runway 9R/27L would be elevated over the Florida East Coast Railway and U.S. Highway 1. The western extent of the runway would be the Dania Cut-Off Canal. Runway 13/31 would be permanently closed to accommodate elevation of Runway 9R/27L. In addition this alternative includes implementation of the operational noise abatement actions described in the County's Airfield Development Program Objective Statement (October 26, 2004). This set of changes is referred to as "Alternative B1c" in the final EIS.

The final EIS presents an analysis of several on-site and off-site site alternatives, in addition to the no-action alternative. The FAA does not present a preferred alternative in the final EIS, however Broward County's preferred alternative is Alternative B1c. This alternative would impact approximately 15.41 acres of wetlands including 3.05 acres of estuarine emergent vegetation (mangroves), which are essential fish habitat (EFH). Other alternatives (i.e., Alternative D1) could adversely affect as much as 21.87 acres of wetlands. The airport

expansion activities are located in waters of the Unites States adjacent to the Dania cut-off canal and Atlantic Intracoastal Waterway (AIWW) in Broward County, Florida. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Consultation History

By letter dated May 17, 2007, NMFS provided the FAA with comments and recommendations in response to the draft EIS. Please see this letter for a complete consultation history and a description of the habitats designated as EFH. In our comments on the draft EIS, NMFS specifically requested that the final EIS include a full assessment of cumulative effects; the FAA or lead federal agency's views regarding the effects of the action on EFH; a compensatory mitigation plan; and Unified Mitigation Assessment Method (UMAM) scores of the mitigation site. In addition, we provided two EFH conservation recommendations:

> (1) A plan shall be developed for providing full, in-kind compensation for unavoidable adverse impacts to wetlands. The plan shall address compensation for loss of productivity and habitat functions that occur during the period between elimination/degradation of existing wetlands and establishment of functionally compatible mangrove habitat that would be protected in perpetuity; and
>
> (2) A monitoring plan shall be developed to assess the ecological success of the offsite, compensatory mitigation. Annual monitoring of the mitigation site shall take place for five years following completion of the mitigation project. In the event it is determined that the implemented mitigation measures do not completely offset the destruction of mangrove wetlands, the plan shall include contingency measures, such as additional planting or exotic vegetation removal, in order to provide functionally suitable replacement habitat. The mitigation/monitoring plan shall be forwarded to the NMFS for review and approval prior to initiation of construction.

Responses to Information Requests and EFH Conservation Recommendations

A full assessment of cumulative effects. In our comments on the draft EIS, we noted that several past, present, and reasonably foreseeable future activities were not included in the discussion of cumulative effects. The final EIS (chapter 7) provides a more thorough evaluation of cumulative effects. NMFS concludes that this information need has been sufficiently addressed.

The FAA's, or lead federal agency's, views regarding the effects of the action on EFH. The final EIS (section 6.F.1.7) states that the FAA has determined there will be no significant impacts to EFH resulting from the implementation of any of the runway development alternatives. This determination considered the project design; the minimal short-term and permanent impacts associated with the installation of light tower foundations, utility cables, and access roads required for the proposed runway approach light configurations; and the mitigation proposed for unavoidable wetland impacts. While we believe that additional information about the mitigation proposal is needed (see section below) before NMFS could agree with the FAA's determination, NMFS finds that the FAA has met the requirement for making a determination.

A compensatory mitigation plan. The final EIS includes conceptual mitigation measures that the FAA would consider as part of the proposed project or alternatives (Section 6J). Specifically, the final EIS states that the FAA has developed conceptual wetland mitigation during this EIS process based on input from and in coordination with the U.S. Army Corps of Engineers, the South Florida Water Management District, and the U.S. Environmental Protection Agency. The final EIS also states that it will be Broward County's responsibility to apply for permits required by these regulatory agencies for the preferred alternative.

While NMFS is familiar with the restoration proposed at West Lake Park associated with Department of the Army permit number 2002-0072 (IP-LAO), we are also aware of other projects by the Broward County Board of County Commissioners (such as the Port Everglades Expansion) that propose to use this mitigation as well. The EFH assessment should fully describe how mangrove impacts would be mitigated. While we agree with the general approach of the conceptual plan, more detail is needed, including Unified Mitigation Assessment Method (UMAM) scores at the mitigation sites, to determine that all functional losses would be mitigated. NMFS concludes that this information need has not been sufficiently addressed.

Unified Mitigation Assessment Method (UMAM) scores. In response to our review of the draft EIS, NMFS noted that the UMAM scores for the wetland areas proposed for impact under Broward County's preferred alternative were provided. However, the only way to determine the amount of mitigation necessary to offset 3.05 acres of mangrove wetlands would be to have UMAM scores for the mitigation site, which were not included in the draft EIS nor are they provided in the final EIS. The compensatory mitigation plan should include all necessary UMAM scores to determine that all functional losses can be mitigated. We conclude that this information need has not been sufficiently addressed.

EFH Conservation Recommendations provided in response to review of the draft EIS. The EFH assessment section in the final EIS does not make any reference to the EFH conservation recommendations provided in response to our review of the draft EIS. As mentioned above, the FAA maintains that it is Broward County's responsibility to develop the permits for the mitigation. However, the EFH section did not summarize the analysis that led the FAA to this conclusion. Section 305(b)(4)(B) of the Magnuson-Stevens Act and its implementing regulation at 50 CFR Section 600.920(k) require that, in the case of a response that is inconsistent with NMFS conservation recommendations, the agency must explain its reasons for not following the recommendations, including the scientific rationale for any disagreements with NMFS over the anticipated effects of the proposed action and the measures needed to offset such effects. NMFS believes the FAA, as the federal action agency, is responsible for documenting that the mitigation would fully offset the lost wetland functions through the National Environmental Policy Act process.

In closing, NMFS can not conclude that the habitat conservation goals of the Magnuson-Stevens Act have been met for this project nor can we conclude that the FAA has met the procedural requirements of the Magnuson-Stevens Act. We maintain our recommendations to develop a compensatory mitigation plan and the associated monitoring. We would be willing to work with the FAA in the development of these plans. We also can advise on the most effective path to completing the EFH consultation.

Thank you for the opportunity to provide comments. Related correspondence should be directed to the attention of Ms. Jocelyn Karazsia at our West Palm Beach office, which is co-located with the US Environmental Protection Agency at USEPA, 400 North Congress Avenue, Suite 120, West Palm Beach, Florida, 33401. She may be reached by telephone at (561) 616-8880, extension 207, or by e-mail at Jocelyn.Karazsia@noaa.gov.

Sincerely,

Pam Willer

/ for

Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc: (via electronic mail)

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Secretary

RECEIVED AUG 0 1 2008

July 28, 2008

Ms. Virginia L. Lane, AICP
Orlando Airports District Office
Federal Aviation Administration
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822-5024

RE: Federal Aviation Administration – Final Environmental Impact Statement for the Development and Expansion of Runway 9R/27L and Other Associated Airport Projects at Fort Lauderdale-Hollywood International Airport – Broward County, Florida.
SAI # FL200806204295C (Reference SAI # FL200703223172C)

Dear Ms. Lane:

The Florida State Clearinghouse, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16, U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4231, 4331-4335, 4341-4347, as amended, has coordinated a review of the referenced final environmental impact statement (FEIS).

The South Florida Water Management District (SFWMD) notes that while a general overview of potential secondary impacts is provided, the FEIS does not provide a comprehensive summary of all potential secondary impacts to wetlands resulting from the proposed runway extension. Upon development of construction documentation, secondary impacts to adjacent wetlands resulting from the proposed project must be fully addressed as part of the SFWMD's Environmental Resource Permit (ERP) application review process, pursuant to Section 4.2.7 of the SFWMD ERP Basis of Review. Based on the submitted project construction information, the runway expansion opening date is 2012-2013. However, construction of the referenced off-site wetland mitigation area is not proposed to be completed until March, 2013. The proposed off-site wetland mitigation must be completed prior to or concurrently with any authorized wetland impacts.

The Florida Department of Environmental Protection (DEP) Southeast District's ERP Section has deferred comments to the SFWMD, which will require modification of ERP No. 06-00339-S for impacts to jurisdictional wetlands. The Southeast District's Air Section also offers the following comments:

- ***Appendix G Air Quality - HAP EMISSION INVENTORY***
  Tables G.1.B-8 through G.1.B-26, which report "*Annual HAP Emissions by Source,*" do not include the particulate matter (PM) contribution from aircraft. PM from *Motor Vehicles* and *Ground Support Equipment* is included under "*Diesel Particulate Matter*" but under "*Aircraft*" there is no data for PM. With the primary non-volatile component of jet engine exhaust being PM and a good approximation that transport aircraft's PM is less than 2.5 micrometers, listing this information would be beneficial. PM contributions from "*Aircraft*" are included within Tables 6.B-3 through 6.B-11 and could be referenced to provide this information.

- ***Appendix P - Response to Comments 7.0 AIR QUALITY***
  Comment 7.33 asks whether the DEP will require Air Quality Permits for the stationary sources at the airport. No new stationary air sources are planned for this EIS. Future stationary sources or major modifications to equipment or operations of existing sources would require appropriate permits.

The Florida Department of Transportation's (FDOT) District Four office in Fort Lauderdale has reviewed the document and notes the following:

- Executive Summary page 6 of 51: Due to proximity of several FHWA limited access facilities, please verify that the preferred alternative will not require coordination/approval from FHWA.
- ES 1.5: There is a statement in the surface transportation section that says there are no impacts to surrounding roads with respect to level of service; however, the preferred alternative will close Airport Perimeter Road. This will divert traffic to other facilities that may have capacity deficiencies. Please provide further clarification on this matter.
- As the design proceeds on the runway expansion, close coordination will be required with the FDOT regarding impacts to US 1 and Griffin Road. Please note that permits from FDOT will be required for the related runway work in the right-of-way for these two roadways. Please contact Becky Mainardi at (954) 777-4404 to coordinate this work with FDOT. A FDOT general use permit will be necessary if an alternative impacts roads. Please contact Sofie Sariol, at (954) 940-7605 prior to developing detailed design plans in order to learn about requirements that may pertain to the project improvements located within and in proximity to state owned right-of-way.
- Please coordinate with the Florida East Coast Railroad (FEC) for comments. If the runway expansion requires construction near or over the FEC railroad tracks, approval and permits will be required from FEC. Please contact Charles Stone at (904) 538-6057 for further assistance.

- Please note that if the runway expansion requires any shifts of the existing FEC tracks in the immediate area, then this may impact the preliminary layout for the future FEC station at the Airport-Seaport Intermodal Center. These impacts should be closely coordinated with Scott Seeburger of FDOT at (954) 777-4632, and David Anderton of Port Everglades at (954) 468-0144.

Please contact Andrew Riddle at (954) 777-4605 for further information.

Based on the information contained in the FEIS and the enclosed state agency comments, state has determined that, at this stage, the proposed activity is consistent with the Florida Coastal Management Program (FCMP). The applicant must, however, address the concerns identified by our reviewing agencies prior to project implementation. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final review of the project's consistency with the FCMP will be conducted during the environmental permitting stage.

Thank you for the opportunity to review the proposed project. Should you have any questions regarding this letter, please contact Mr. Christopher Stahl at (850) 245-2169.

Yours sincerely,

Sally B. Mann

Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/cjs
Enclosures

cc: Tim Gray, DEP, Southeast District
Jim Golden, SFWMD
Lisa Stone, FDOT