

**U.S. Department of Transportation
Federal Aviation Administration**

**Proposed Construction of Mobile Asset Staging Area (MASA)
Greensboro, North Carolina**

Draft Environmental Assessment

JULY 2023

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ACRONYMS & ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ACS	American Community Survey
APE	Area of Potential Effects
AQI	Air Quality Index
ATCT	Airport Traffic Control Tower
ATO	Air Traffic Organization
BLS	Bureau of Labor Statistics
BMP	Best Management Practice
CAA	Clean Air Act
CAMA	Coastal Area Management Act
CBRA	Coastal Barriers Resources Act
CBRS	Coastal Barrier Resources System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	[U.S.] Council on Environmental Quality
CFR	Code of Federal Regulations
CO ₂ e	Carbon Dioxide Equivalent
CZMA	Coastal Zone Management Act
dB	Decibels
DNL	Day-Night Average Sound Level
DOT	[United States] Department of Transportation
EA	Environmental Assessment
ECOS	Environmental Conservation Online System
EO	Executive Order
EPA	[U.S.] Environmental Protection Agency
ESA	Endangered Species Act
°F	degrees Fahrenheit
FAA	[U.S.] Federal Aviation Administration
FCC	Federal Communication Commission
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FPPA	Farmland Protection Policy Act
GHG	Greenhouse Gas
GSO	Piedmont Triad International Airport
IPaC	Information for Planning and Conservation
LAUS	Local Area Unemployment Statistics
MASA	Mobile Asset Staging Area
MASP	Mobile Asset Sustainment Program
MHI	Median Household Income
MMPA	Marine Mammal Protection Act
MMT	Million Metric Ton
MPO	Metropolitan Planning Organization
MSA	Metropolitan Statistical Area
NAAQS	National Ambient Air Quality Standards

NAS	National Airspace System
NCAC	North Carolina Administrative Code
NCDEQ	North Carolina Department of Environmental Quality
NCEI	National Centers for Environmental Information
NCP	Noise Compatibility Program
NEM	Noise Exposure Map
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PM	Particulate matter
PM ₁₀	Particulate matter equal to or less than 10 microns in size
PM _{2.5}	Particulate matter equal to or less than 2.5 microns in size
PTAA	Piedmont Triad Airport Authority
RCRA	Resource Conservation and Recovery Act
RTR	Remote Transmitter/Receiver (RTR)
SARA	Superfund Amendments and Reauthorization Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
THPO	Tribal Historic Preservation Officer
TRACON	Terminal Radar Approach Control Facility
U.S.	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VHF	Very High Frequency
VOC	Volatile Organic Compound
VOR	Very High Frequency Omni-Directional Range

1.0 INTRODUCTION

The Federal Aviation Administration (FAA) Mobile Asset Sustainment Program owns and maintains transportable National Airspace System (NAS) equipment that is used to supplement air traffic operations during periods of increased activity (i.e., NFL Super Bowl, NASCAR races, etc.) or restore air traffic operations during periods of extended equipment outages to ensure continuity of NAS operations. The FAA is proposing to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, North Carolina, to be used for storage, maintenance, and deployment of mobile NAS equipment (hereafter referred to as the Proposed Action).

The National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) requires the FAA as a Federal agency to evaluate the potential environmental impacts of its proposed action and alternatives to the proposed action, in order to make an informed decision in defining a proposed project for implementation. The FAA must consider and incorporate, to the extent practicable, measures to avoid, minimize or mitigate adverse impacts to the human environment. This environmental assessment (EA) serves as a documentation of FAA's analysis of the potential impacts of the proposed GSO MASA project, including analysis of project alternatives and identification of impact minimization measures, pursuant to NEPA, Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations), 40 Code of Federal Regulations (CFR) Parts 1500-1508, and all applicable FAA Orders.

1.1 BACKGROUND

Mobile NAS equipment provides for the continuity or restoral of air traffic control when an airport traffic control tower (ATCT) or other NAS system is out of service due to a disaster or for non-routine maintenance, modernization, or upgrade. Mobile NAS equipment may also be required to augment air traffic control functions at some locations during major public events to ensure safe operations. Until 2013, mobile assets were managed by the Air Traffic Organization's (ATO) legacy regional areas and were dispersed around the service areas which made deployments a challenge. These assets were not always properly maintained; sometimes they were left outside and exposed to the elements.

In 2013, ATO established the Mobile Asset Sustainment Program (MASP) to manage, maintain, and develop the agency's mobile assets. MASP was also responsible for facilitating disaster recovery, and augmenting air traffic devices when needed on a temporary basis (e.g., air shows and sporting events).

1.2 PURPOSE AND NEED

The FAA has determined the need to stage mobile NAS equipment at a location in the eastern United States to allow for rapid deployment of mobile assets. The purpose of the Proposed Action is to provide a facility near a major commercial airport within the eastern United States that is suitable to support the staging, maintenance, and rapid deployment of mobile NAS

equipment. The location near a major commercial airport is required to support the staging, maintenance, and deployment of assets, thereby enhancing air traffic safety. The Proposed Action is needed because if no action is taken the FAA would lack the capability to stage mobile NAS equipment in a centralized location within the eastern United States. Such an alternative would compromise the ability to provide rapid restoration of air traffic services during periods of extended equipment outages.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION (PREFERRED ALTERNATIVE)

FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. The preferred location is a FAA-leased parcel located at 7217 Cessna Drive. This site is gently sloped, requiring minimal excavation, and provides private and easy access for staging, storing and deploying FAA mobile assets. The site (approximately 190' x 470') is sufficiently sized to meet the MASA footprint and has adequate power, water, sewer, and fire hydrant connections in the vicinity. This alternative takes advantage of using a vacant site within a developed industrial park and limits tree removal and excavation activities in the area.

The proposed facility would be a rectangular, single-story building containing a six-bay storage area, and an office, locked storeroom, utility room, and bathroom. The building would be surrounded by paved areas to allow for vehicle access to the storage bays. Property access would be via existing roadways such as Cessna Drive and South Regional Road (State Route 1695). The proposed project will develop less than half of the parcel of land.

Mobile equipment anticipated to be staged at the MASA include the following:

- One mobile Terminal Radar Approach Control Facility (TRACON), Q12;
- One mobile ATCT, Q52;
- One mobile Remote Transmitter/Receiver (RTR), Q75; and
- One mobile Very High Frequency (VHF) Omni-Directional Range (VOR), Q50.

Mobile TRACONs are staffed units that use radar and nonradar capabilities to provide approach control services to aircraft arriving, departing, or transiting airspace controlled by the facility. A mobile ATCT is a staffed unit used for air/ground communications, land or takeoff authorization, taxing, and visual signaling at airports. The mobile RTR is an unstaffed unit that enables air-to-ground communications between air traffic control specialists and pilots. The mobile VOR is a ground based electronic aid transmitting VHF signal used as a basis for navigation in the NAS.

FAA assigns three letter location identifiers to FAA owned or operated facilities. Mobile assets are not fixed and do not have location-specific identifiers. Therefore, FAA assigned the letter "Q" and a number as the unique identifiers for mobile assets.

2.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the FAA would not lease the proposed project site and would not construct the 10,000-square foot storage facility. With the No Action Alternative, FAA would lack the capability to stage mobile NAS equipment in a central location within the eastern United States. Such an alternative would compromise the FAA's ability to provide rapid restoration of air traffic services during periods of extended equipment outages and would not meet the FAA's Purpose and Need.

2.3 OTHER ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER CONSIDERATION

Six alternate sites owned by the Piedmont Triad Airport Authority (PTAA) near GSO were considered for the MASA. However, these six sites were eliminated for reasons such as insufficient parcel size, lack of existing utility connections, poor site access for large mobile assets, nearby residential properties, inappropriate zoning, or the presence of mature trees. For FAA's eastern service area, the MASP evaluated sites in the southeast. Other locations along the east coast were excluded as viable MASAs because of climate and access to major transportation corridors. For example, coastal areas were excluded because of major storms and flooding. The northeast was excluded because of colder weather and snow that could impact deployment of mobile assets. Inland North and South Carolina have a mild climate and accessible transportation corridors to the north and south, including Washington, D.C. The vicinity of Columbia Metropolitan Airport in South Carolina was considered; however, there was insufficient technical support from local FAA staff and no viable sites that met the criteria.

3.0 AFFECTED ENVIRONMENT

This section of the EA describes the existing environmental conditions of the geographic area that may potentially be affected by the Proposed Action. The purpose of this description is to provide a baseline from which to analyze the impacts of the Proposed Action in Chapter 4, Environmental Consequences. Therefore, the same 14 environmental impact categories specified by FAA Order 1050.1F and guidance from the CEQ are used in both Chapters 3 and 4. A brief description of the general characteristics of the geographic areas is provided in the introduction of this chapter. The descriptions of each of the affected environment categories begins with a brief synopsis of the Federal, state and local laws, regulations, and ordinances that guide the content of the discussions. For more detailed information about these laws, regulations and ordinances, please refer to the full text of the appropriate document as cited.

Facility Description and Vicinity

The proposed MASA location is on an FAA-leased parcel of land near GSO owned by Bessemer Improvement Company at 7217 Cessna Drive, Greensboro, North Carolina 27409. The proposed location is south of Cessna Drive, within the city limits of Greensboro, approximately nine miles west of downtown and ½-mile southwest of GSO airport property boundary. The areas immediately surrounding the proposed location consist of industrial properties and roadways. Detailed images and maps of the area are provided in Figures 1, 2, 3, and 4.

The FAA possesses the authority to lease directly from property owners. FAA's Real Estate Contracting Officer's (RECO) negotiated a direct lease with the property owner for the GSO MASA parcel. They completed an analysis of the proposed site and concluded the parcel met size, utility connections, zoning, water, sewage, and accessibility requirements.

The parcel of land (Parcel Number 98138), approximately 2.08 acres total, was historically used for agriculture. With the expansion and surrounding development of GSO, agricultural use declined over several decades. Based on a review of historical aerial photos, the parcel was completely covered with trees in 1993. Development of adjacent parcels and the removal of majority of trees on the parcel were completed by 1999. The parcel was never developed nor excavated. The parcel is currently vacant and zoned for heavy industrial use.

Figure 1. Facility and Vicinity Map

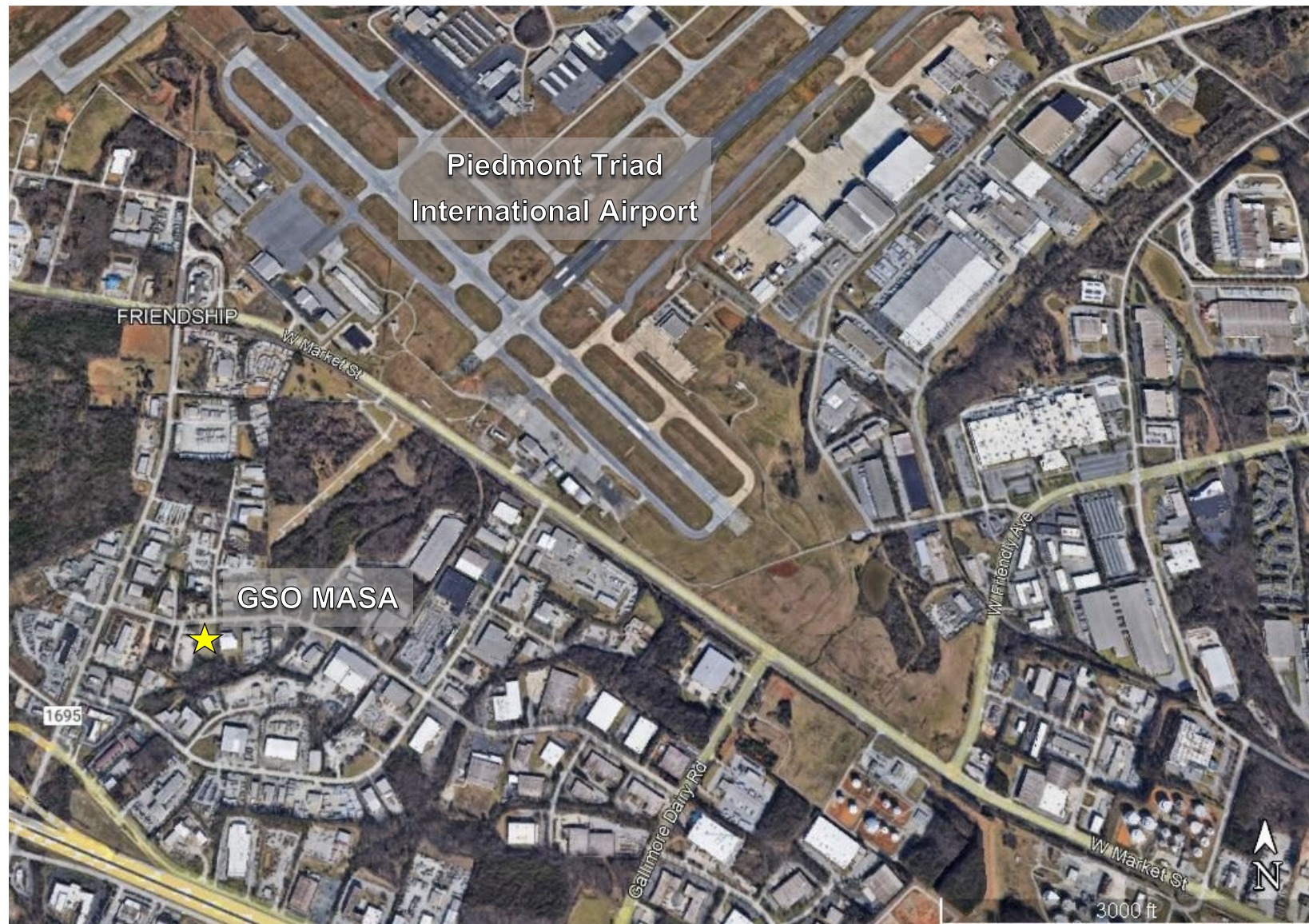


Figure 2. Site Area Map



Figure 3. Preliminary Site Drawing

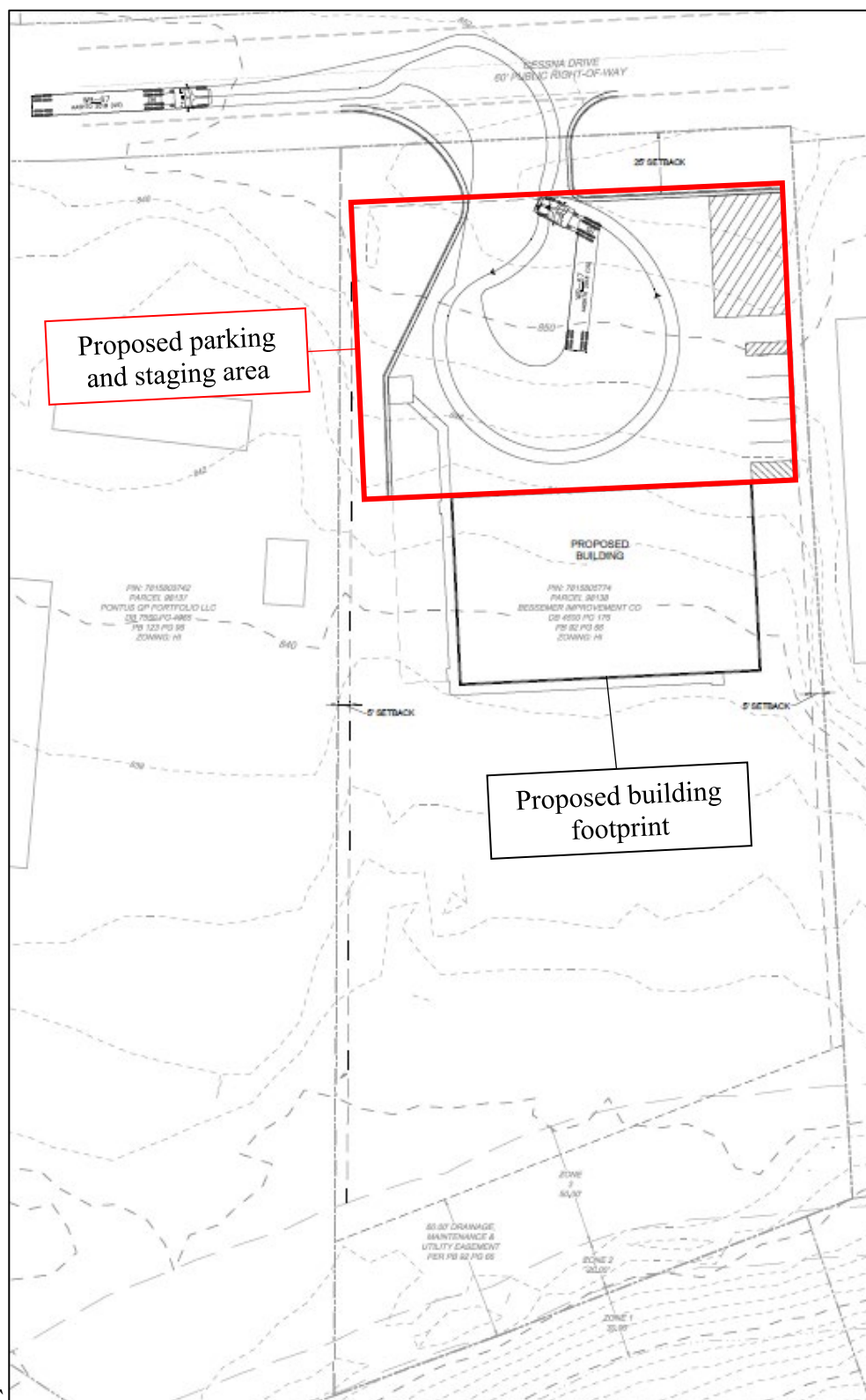


Figure 4. Proposed Project Site (view facing North)***Geology and Soils***

North Carolina is divided into three physiographic provinces: the Coastal Plain, the Piedmont and the Blue Ridge. The City of Greensboro and Guilford County are located within the Piedmont physiographic province and the Carolina geologic terrane. The Piedmont Province lies between the Coastal Plain and the Blue Ridge Mountains. Along the border between the Piedmont and the Coastal Plain, elevations range from 300 to 600 feet above sea level. To the west, elevations gradually rise to about 1,500 feet above sea level at the foot of the Blue Ridge. The Piedmont is characterized by gently rolling, well-rounded hills and long low ridges with a few hundred feet of elevation difference between the hills and valleys. The Carolina terrane consists of heated and deformed volcanic and sedimentary rocks, and contains rocks associated with a series of oceanic volcanic islands about 540-630 million years old. According to the State Geologic Map of North Carolina, the proposed GSO MASA location is underlain by granitic and metamorphosed gabbro and diorite bedrock. Soils in the vicinity of the proposed GSO MASA location are Enon fine sandy loam, Coronaca clay loam and Chewacla loam (NRCS Web Soil Survey).

Local Climate (Meteorology)

Guilford County is located in the eastern Piedmont climatic region. Summers are generally hot and humid, and winters are cold but relatively short since the mountains to the west protect the county against most cold waves. Climatological data obtained at the GSO weather station is provided in Table 1.

Table 1: Annual Climate Normals for Greensboro Airport (1991 – 2020)

Weather Data	Annual Average
Average High Temperature (°F)	69.8
Average Low Temperature (°F)	49.4
Average Mean Temperature (°F)	59.6
Average Annual Precipitation (inches)	43.95

Source: National Centers for Environmental Information (NCEI)

3.1 AIR QUALITY

The Clean Air Act (CAA) (42 U.S.C. §7401 et seq.) has established National Ambient Air Quality Standards (NAAQS) for six pollutants, termed “criteria pollutants” (ground-level ozone, particulate matter [equal to or less than 10 microns in size (PM₁₀) and equal to or less than 2.5 microns in size (PM_{2.5})], carbon monoxide, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead). The CAA requires each state to adopt a plan to achieve the NAAQS for each pollutant within specific timeframes. These air quality plans, known as State Implementation Plans (SIPs), are subject to U.S. Environmental Protection Agency (EPA) approval. Pursuant to 40 CFR Part 93, Federal agencies must perform a general conformity analysis for any Federal action in nonattainment or maintenance areas where the total of direct and indirect emissions of the applicable criteria pollutants or their precursors exceeds certain thresholds.

On December 17, 2004, EPA designated the Greensboro Urban Area Metropolitan Planning Organization (along with the other three Triad area MPOs) as a Non-Attainment Area under the Fine Particulate Matter (PM_{2.5}) National Ambient Air Quality Standard. This designation became effective on April 5, 2005. The U.S. Department of Transportation (DOT) and EPA found the Greensboro Urban Area Metropolitan Organization (along with the other three Triad MPOs) to be conforming for Fine Particulate Matter (PM_{2.5}) on April 5, 2006. On November 18, 2011, EPA took final action to approve a request submitted on December 18, 2009 and supplemented on December 22, 2010, from the State of North Carolina, to re-designate the Greensboro-Winston-Salem-High Point PM_{2.5} nonattainment area to attainment status. The 2018 North Carolina Department of Environmental Quality (NCDEQ) Air Quality Index (AQI) Summary for Greensboro-Winston-Salem Metropolitan Statistical Area (MSA) indicated 233 days of good AQI greater than or equal to 50, 130 days with moderate AQI values 51-100, and 2 days with “Unhealthy for Sensitive Groups” AQI values 101-150. As of May 2023, all criteria pollutants are in attainment status.

3.2 BIOLOGICAL RESOURCES

Federal agencies are required to assess potential impacts from agency actions to fish, wildlife, and plants and their habitats under several Federal laws, Executive Orders (EOs) and regulations. These include the Endangered Species Act (ESA) (16 U.S.C. § 1531 et seq.), the Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-667d), the Migratory Bird Treaty Act (16 U.S.C. § 703 et seq.), the Marine Mammal Protection Act (MMPA) (16 U.S.C. § 1361 et seq.), and the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq.). Section 7 of the ESA requires Federal agencies to “request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action” for any project that is conducted, permitted, funded, or licensed by any Federal agency. The term “endangered species” means any member of the animal kingdom (mammal, fish or bird) or plant kingdom (seeds, roots, etc.) that is in danger of extinction throughout all or a significant portion of its range. “Threatened species” refers to those members of the animal or plant kingdoms, which are likely to become endangered within the foreseeable future.

The North Carolina General Statute (G.S.) Chapter § 113, Article 25 Endangered and Threatened Wildlife and Wildlife Species of Special Concern by way of the Wildlife Resources Commission has authority to “add or remove a species of wild animal from a state-protected list of special concern species.” Furthermore, all native or resident wild animals on the federal lists of endangered or threatened species pursuant to the ESA have the same status on the North Carolina protected animals’ lists.

Existing habitat in the proposed project site is comprised mainly of developed industrial land. The FAA has completed the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) project planning tool to help with the environmental review process in Guilford County. Per this documentation, it was determined that the Small Whorled Pogonia (*Isotria medeoloides*) is a threatened plant and the Schwintz’s Sunflower (*Helianthus schweinitzii*) is endangered plant in this area. The Monarch Butterfly (*Danaus plexippus*) is a candidate species.

The FAA completed a review of the North Carolina Heritage Program’s endangered, threatened, and special concern species list for Guilford County. Per this list, it was determined that the Carolina Creekshell (*Villosa vauhaniana*) is an endangered freshwater bivalve in the area. The Triangle Floater (*Alasmidonta undulata*) and Notched Rainbow (*Villosa constricta*) are threatened freshwater bivalves in the area. The Purple Fringeless Orchid (*Platanthera peramoena*) is a threatened vascular plant in the area. The Mole Salamander (*Ambystoma talpoideum*), Four-toed Salamander (*Hemidactylium scutatum*), Greensboro Burrowing Crayfish (*Cambarus catagius*), and the Carolina Darter fish (*Etheostoma collis*) are species of special concern in the area. The Program did not identify any natural or managed areas, including critical habitats at the proposed project site. See Appendix B for copies of consultation information.

The Migratory Bird Treaty Act protects migratory birds by prohibiting private parties (and Federal agencies in certain judicial circuits) from intentionally taking, selling, or conducting other activities that would harm migratory birds, their eggs, or nests (such as-- removal of an

active nest or nest tree), unless the Secretary of the Interior authorizes such activities under a special permit. Coordination with USFWS may be necessary if a proposed project has the potential to affect migratory birds.

The City of Greensboro Urban Forester within the Planning Department implements the city's Tree Conservation Ordinance. Unless exempted, site grading or tree removal will require an approved site plan or a tree disturbance permit.

3.3 CLIMATE

While there are no Federal statutes or regulations concerning climate change assessments, climate change is a fundamental environmental issue and thus within the purview of NEPA. In accordance with the FAA Order 1050.1F Desk Reference, the affected environment section for climate is highly dependent on the project itself and is defined as the entire geographic area that could be either directly or indirectly affected by the proposed project. Greenhouse gas (GHG) emissions may be used as a proxy to provide a better understanding of the potential climate impacts of a proposed action and may be evaluated qualitatively or quantitatively.

GHG emissions from operation of the GSO MASA will come primarily from the use of electricity to operate lights in and around the facility. Nonrefrigerated warehouses in the U.S. use an average of 6.1 kilowatt-hours (kWh) of electricity per square foot annually. The GSO MASA warehouse will use an estimated 61,000 kWh of electricity annually. *EPA's 2020 eGRID Data Explorer* for CO₂ total output emission rate for North Carolina, the GHG emissions associated with that level of electricity usage are estimated at 17.85 metric tons of carbon dioxide equivalents (CO_{2e}) annually. To put those emissions in context, according to the EPA the total gross GHG emissions in the U.S. in 2020 were 5,981 million metric tons (MMT) of CO_{2e}.

According to the fourth National Climate Assessment, average annual temperature during the last century across the Southeast cycled between warm and cool periods. A warm peak occurred during the 1920s and 1930s followed by a cool period in the 1970s. Temperatures increased again from 1970, with the 2010 to 2017 being the warmest time period on record. Since 1970 temperatures increased by an average of 2°F, with higher average temperatures during summer months. As part of the Southeast region, North Carolina is vulnerable to sea level rise, extreme heat events, hurricanes, and decreased water availability. The geographic distribution of these impacts and vulnerabilities is uneven, since the region encompasses a wide range of natural system types, from the Appalachian Mountains to the coastal plains. However, heavy rainstorms are more frequent, and the sea is rising about 0.15 inches every year. Precipitation is likely to increase during winter and spring, but not change significantly during summer and fall. Rising temperatures will melt snow earlier in spring and increase evaporation, and thereby dry the soil during summer and fall. As a result, changing the climate is likely to intensify flooding during winter and spring, and drought during summer and fall.

3.4 COASTAL RESOURCES

Federal activities involving or affecting coastal resources are governed by the Coastal Barriers Resources Act (CBRA) (16 U.S.C. § 3501 et seq.), the Coastal Zone Management Act (CZMA)

(16 U.S.C. §§ 1451-1466), and EO 13089, *Coral Reef Protection*. The CBRA prohibits, with some exceptions, Federal financial assistance for development within the Coastal Barrier Resources System (CBRS) that contains undeveloped coastal barriers along the Atlantic and Gulf coasts and Great Lakes. The CZMA established the Federal Coastal Zone Management Program to encourage and assist states in preparing and implementing management programs to “preserve, protect, develop, and where possible, to restore or enhance the resources of the nation’s coastal zone.” The National Oceanic and Atmospheric Administration (NOAA) provides procedures for ensuring that a proposed action is consistent with approved coastal zone management programs (15 CFR Part 930). EO 13089 requires that Federal agencies ensure that any actions that they authorize, fund, or carry out will not degrade the conditions of the coral reef ecosystems.

The North Carolina Coastal Area Management Act (CAMA) of 1974 applies to all 20 counties on the coast of North Carolina. The purpose of CAMA is to control development pressure within North Carolina’s coastal region in order to protect those attributes that make it economically, aesthetically and ecologically rich. The CAMA does not apply in Guilford County. There are no coastal resources near the proposed project site.

3.5 DEPARTMENT OF TRANSPORTATION ACT, SECTION 4(F)

Section 4(f) of the Department of Transportation (DOT) Act (49 U.S.C. § 303) provides that the Secretary of Transportation will not approve any program or project that requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance or land from an historic site of national, state or local significance as determined by the officials having jurisdiction thereof, unless there is no feasible and prudent alternative to the use of such land and such program, and the project includes all possible planning to minimize harm resulting from the use.

According to the North Carolina Natural Heritage Program, several parcels of Guilford County are open space and located within one mile of the proposed project site. There is one parcel of local government owned land that appears to be a riparian zone for the East Fork Deep River. The local government entity was not provided in the North Carolina Natural Heritage Program database. No publicly owned land is slated for use within the proposed project site.

3.6 FARMLANDS

The Farmland Protection Policy Act (FPPA) (7 USC §§ 4201-4209) requires that Federal agencies identify and consider the adverse effects of their programs on the preservation of farmlands. The FPPA applies to farmland defined as “prime” or “unique” in Section 1540(c)(1) of the Act (7 USC § 4201(c)(1)), or to farmland of statewide or local importance as defined by the appropriate state or local agency. The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) policy and procedures on prime and unique farmlands are outlined in 7 CFR Part 657.

The proposed project site soil primarily consists of Coronaca clay loam which is classified in North Carolina as a prime farmland. The remaining site soil is Enon fine sandy loam and

Chewacla loam. The proposed project site is in an urban area that is not currently being used for agricultural purposes. Much of the area in proximity to the proposed project site is urban development or forested lands.

3.7 HAZARDOUS MATERIALS, SOLID WASTE, AND POLLUTION PREVENTION

EO 12088, *Federal Compliance with Pollution Control Standards*, directs Federal agencies to: comply with “applicable pollution control standards”, in the prevention, control, and abatement of environmental pollution; and consult with the EPA, state, interstate, and local agencies concerning the best techniques and methods available for the prevention, control, and abatement of environmental pollution. The two statutes of most importance to FAA in proposing actions to construct and operate facilities and navigational aids are the Resource Conservation and Recovery Act (RCRA) (as amended by the Federal Facilities Compliance Act of 1992) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA or Superfund) and the Community Environmental Response Facilitation Act of 1992. RCRA (42 U.S.C. §§ 6901-6992k) governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA (42 U.S.C. §§ 9601-9675) provides for consultation with natural resources trustees and cleanup of any release of a hazardous substance (excluding petroleum) into the environment.

There are no National Priorities List (NPL), candidate NPL, other active CERCLA, or RCRA Corrective Action sites at or adjacent to the proposed project site.

3.8 HISTORICAL, ARCHITECTURAL, ARCHAEOLOGICAL, AND CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. §§ 300101 et seq.) requires Federal agencies to consider the effects of their actions on properties included, or eligible for inclusion, in the National Register of Historic Places (NRHP). Section 106 requires consultation with the Advisory Council on Historic Preservation, the State Historic Preservation Officer (SHPO) and/or the Tribal Historic Preservation Officer (THPO) if there is a potential adverse effect to historic properties on or eligible for listing on the NRHP.

The proposed project site and its Area of Potential Effects (APE) were previously surveyed for historic resources in 2014. The APE is defined as the parcels within which the construction would take place, and any surrounding properties from which the new MASA would be visible. No National Register (NRHP)-eligible historic properties were identified within the proposed project’s APE.

Pursuant to Section 106 and in accordance with EO 13175, *Consultation and Coordination with Indian Tribal Governments*, and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*, FAA conducted government-to-government consultation with Indian Tribes. FAA notified the following four Tribal Nations on December 7, 2022:

- Catawba Indian Nation
- Eastern Band of Cherokee Indians
- Muscogee (Creek) Nation
- Tuscarora Nation

See Appendix B for copies of consultation letters with state and tribal agencies and responses.

3.9 LAND USE

Section 1502.16(c) of the CEQ Regulations requires a review of “possible conflicts between the proposed action and the objectives of Federal, regional, state, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.” Where an inconsistency exists, the NEPA document should describe the extent to which the agency would reconcile its action with the plan.

The proposed project site is located within the city limits of Greensboro, approximately nine miles west of downtown. According to City of Greensboro zoning maps, the proposed project site is in a “heavy industrial” zone southwest of GSO. The proposed project site is surrounded by developed parcels and bordered by Cessna Drive to the north. The proposed facility would be a rectangular, single-story building containing a six-bay storage area, and an office, locked storeroom, utility room, and bathroom. The building would have paved areas between it and Cessna Drive to allow for vehicle access to the storage bays. Property access would be via existing roadways such as South Regional Road (State Route 1695) and Cessna Drive.

3.10 NATURAL RESOURCES AND ENERGY SUPPLY

EO 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, signed on December 8, 2021, requires Federal agencies to demonstrate leadership in energy and water use, building modernization, and acquisition management.

The energy supply for the Proposed Action site consists of electricity supplied by Duke Energy Carolinas. The City of Greensboro will provide water and sewer service upon request for the site. The application for new water and sewer connections can be found on the City’s website at <https://www.greensboro-nc.gov/departments/water-resources/customer-service-for-residents-and-businesses>.

3.11 NOISE AND NOISE-COMPATIBLE LAND USE

Noise in the vicinity of airports and its impacts on people and communities is addressed by several Federal laws including the Control and Abatement of Aircraft Noise and Sonic Boom Act of 1968 (49 U.S.C. § 44715), the Noise Control Act of 1972 (42 U.S.C. §§ 4901-4918), Aviation Safety and Noise Abatement Act of 1979 (49 U.S.C. § 47501 et seq.), Airport and Airway Improvement Act of 1982 (49 U.S.C. § 47101 et seq.), and the Airport Noise and Capacity Act of 1990 (49 U.S.C. §§ 47521-47534). Aviation-related noise impacts are regulated by FAA under 14 CFR Part 150 and Advisory Circular 150/5020-1, *Noise Control and Compatibility Planning for Airports*. For facility and equipment noise emissions, the provisions of the Noise Control Act of 1972 apply.

The proposed project site is located approximately 1,000 feet from the southern edge of GSO. The PTAA conducted a 14 CFR Part 150 study for GSO, and it was approved by the FAA in November 2008. Part 150 studies involve the creation of Noise Exposure Maps (NEMs) and

Noise Compatibility Programs (NCPs). A NEM is designed to clearly identify an airport's present and future noise patterns and the land uses which are not compatible with those noise patterns. An NCP shows what measures the airport operator has taken or proposes to take to reduce, and/or prevent the introduction of, noncompatible land uses within the area covered by the airport's NEM. The PTAA continues the implementation of the Part 150 Study measures, including 20 operational measures. The five land use measures include the acquisition of properties with houses or other noise-sensitive land uses where DNL exceeds 70 dB and the obligation to pursue compatible use zoning in the vicinity of the airport.

In 2020, PTAA conducted a Part 150 Update to quantify noise exposure from aircraft operations, assess compatibility of land uses around the airport, and evaluate the current NCP measures to determine their continued effectiveness in reducing noncompatible land uses. This Part 150 Update assesses noise exposure resulting from the existing condition (2020) and a five-year forecast condition (2025) and recommends amending the FAA-approved NCP measures. The Part 150 Update is part of the broader effort to address noise exposure resulting from aircraft operations; it covers a study area that includes the airport and surrounding communities in Forsyth and Guilford Counties.

The proposed project site has a DNL of 60 dB based on the 2020 Update. Noise sensitive areas such as national parks, national wildlife and waterfowl refuges and historic sites, and traditional cultural properties are not located within or in the vicinity of the property.

3.12 SOCIOECONOMICS, ENVIRONMENTAL JUSTICE, AND CHILDREN'S ENVIRONMENTAL HEALTH AND SAFETY

Section 102(A) of NEPA requires agencies to “insure the integrated use of the natural and social sciences...in planning and decision making (42 U.S.C. § 4332(A)).” Socioeconomics refers to a broad, social science-based approach to understanding a region's social and economic conditions. It typically includes population, demographic descriptors, economic activity indicators, housing characteristics, and poverty values.

Environmental justice is a related topic that specifically addresses the presence of minority populations (defined by race and Hispanic ethnicity) and low-income populations, in order to give special attention to potential impacts on those populations, per EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. EO 12898 requires each Federal agency to include environmental justice as part of its missions by identifying and addressing, as appropriate, disproportionately high and adverse impacts of its programs, policies, and activities on minority and/or low-income populations. Subsequently, the DOT issued Order 5610.2(a), *Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, which requires FAA to implement the principles of EO 12898 in all programs, policies, and activities.

FAA Order 5100.37B, *Land Acquisition and Relocation Assistance for Airport Projects*, implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 U.S.C § 4601 et seq.) requires fair, consistent and equitable treatment of owners of real property

to be acquired for Federal and Federally-assisted projects and persons displaced as a direct result of Federal projects.

EO 13045, *Protection of Children and Environmental Health and Safety Risks*, directs Federal agencies, as appropriate and consistent with the agency's mission, to identify and assess environmental health and safety risks that may disproportionately affect children. These risks are defined as risks to health or safety that are attributable to products or substances that a child is likely to come in contact with or ingest.

This section will address socioeconomic topics, such as total population, household income, unemployment as well as an environmental justice, including race and ethnicity and poverty status within Guilford County, North Carolina. These statistics will be compared to the same statistics of the state of North Carolina and the United States.

3.12.1 Socioeconomics

Total Population

The proposed project site is located in the City of Greensboro, Morehead Township, Guilford County, North Carolina. The population in Guilford County in 2021 was 537,174 people and population in Morehead Township in 2021 was 207,865. Gilmer and Morehead Townships comprise the incorporated area of the City of Greensboro. Morehead Township is the largest township in Guilford County. It has experienced 2% growth in the last six years. Table 2 presents the total population of the 18 townships in Guilford County.

Table 2. Total Population in Guilford County, 2021

Township	Total Population (2016)	Total Population (2021)	Percent Change
Bruce Township	10,237	10,809	5.6%
Center Grove Township	8,487	8,826	4.0%
Clay Township	7,165	6,862	-4.2%
Deep River Township	19,322	22,641	17.2%
Fentress Township	10,087	11,583	14.8%
Friendship Township	9,168	8,919	-2.7%
Gilmer Township	78,478	87,618	11.6%
Greene Township	3,499	3,559	1.7%
High Point Township	82,767	82,726	0.0%
Jamestown Township	13,401	13,322	-0.6%
Jefferson Township	12,239	11,221	-8.3%
Madison Township	5,267	6,047	14.8%
Monroe Township	11,108	11,761	5.9%
Morehead Township	203,699	207,865	2.0%
Oak Ridge Township	11,961	14,139	18.2%
Rock Creek Township	12,608	15,771	25.1%
Sumner Township	9,356	10,326	10.4%
Washington Township	2,966	3,118	5.1%
Guilford County	511,815	537,113	4.9%

Source: U.S. Census Bureau, American Community Survey (ACS), 2021 5-Year Estimates, B01003 files

Household Income

Household income is a useful measure, and often used instead of family income, because in modern society there are many single-person households and households composed of non-related individuals. Median household income (MHI) is the income at which half of all households have higher income, and half have lower income. The MHI for Guilford County is \$58,646, compared to the MHI for the State of North Carolina, which is \$60,516. This is \$1,870 below the MHI for the State of North Carolina. Morehead Township's MHI is \$58,350, this is \$2,166 lower than for the State of North Carolina. Table 3 presents a breakdown of the MHI for the 18 townships in Guilford County in the past 12 months in 2021 inflation-adjusted dollars.

Table 3. Median Household Income in Guilford County, 2021

Township	MHI (2021)
Bruce Township	\$117,872
Center Grove Township	\$154,107
Clay Township	\$83,650
Deep River Township	\$95,464
Fentress Township	\$72,450
Friendship Township	\$86,298
Gilmer Township	\$42,291
Greene Township	\$70,185
High Point Township	\$45,922
Jamestown Township	\$80,126
Jefferson Township	\$63,397
Madison Township	\$81,396
Monroe Township	\$66,143
Morehead Township	\$58,350
Oak Ridge Township	\$125,152
Rock Creek Township	\$84,116
Sumner Township	\$64,803
Washington Township	\$73,421

Source: U.S. Census Bureau, ACS, 2021 5-Year Estimates, B19013 file

Unemployment Status

Employment status is a key socioeconomic parameter because employment is essential to the income of a large portion of the adult population. The Federal government calculates the unemployment rate as the number of unemployed individuals who are looking for work divided by the total number of individuals in the labor force. The Bureau of Labor Statistics (BLS) publishes four data measures—labor force, employment, unemployment, and unemployment rate—monthly for approximately 7,500 subnational areas, including all 50 states, the District of Columbia, and several large metropolitan areas and divisions. Table 4 provides these measures at the county and state levels.

Guilford County, at a 4.2 percent unemployment rate, is slightly less than the state average of 4.8.

Table 4. Unemployment Data for Guilford County and North Carolina State, 2021

Geography	Labor Force	Employed	Unemployed	Unemployment Rate
Guilford County	258,972	246,250	12,722	4.2
North Carolina	--	--	--	4.8

Source: BLS, Local Area Unemployment Statistics (LAUS), 2021 Annual Averages, last updated January 4, 2023

3.12.2 Environmental Justice

In 1997, the CEQ issued *Environmental Justice: Guidance under the National Environmental Policy Act (NEPA)* to assist Federal agencies in meeting the requirements of EO 12898. The CEQ guidance provides several important definitions and clarifications that this EA utilizes:

- Minority populations consist of “Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.”
- Low-income populations consist of individuals living in poverty, as defined by the U.S. Census Bureau.

Table 5 presents 2021 data on the composition of Guilford County’s population by race and by Hispanic origin. Hispanic origin is a different category than race; persons of any race may identify as being of Hispanic origin. Morehead Township is well over the state average (39.3%) with 54.4% of the total population reporting that they categorized themselves as a member of a minority population, but it ranks third overall against the other townships in Guilford County. Gilmer Township has the highest percentage (86%) of the population reporting themselves as a member of a minority population.

Table 5. Guilford County's Race and Hispanic Origin, 2021

Geography	Total Population (estimated)	Race and Hispanic Origin							
		White	Black/ African Am.	Am. Indian/ Alaska Native	Asian	Native Hawaiian /Pacific Islander	Another Race	Two or More Races	Hispanic
Guilford County	537,113	52.5%	34.4%	0.4%	5.7%	0.2%	5.6%	7.0%	8.4%
Bruce Township	10,809	89.0%	3.6%	0.0%	5.2%	0.0%	2.9%	4.6%	3.7%
Center Grove Township	8,826	90.0%	3.4%	1.1%	4.0%	0.0%	0.4%	2.9%	1.4%
Clay Township	6,862	84.5%	6.0%	0.1%	2.0%	0.0%	0.3%	3.3%	5.4%
Deep River Township	22,641	64.7%	15.1%	0.3%	0.3%	0.0%	0.4%	8.8%	5.8%
Fentress Township	11,583	81.8%	10.3%	0.1%	12.7 %	0.0%	2.1%	5.0%	3.8%
Friendship Township	8,919	64.1%	20.7%	0.0%	1.6%	0.0%	1.6%	4.6%	3.8%
Gilmer Township	87,618	18.4%	69.6%	0.3%	10.6 %	0.0%	1.9%	2.7%	8.9%
Green Township	3,559	86.3%	4.6%	0.0%	2.8%	0.0%	4.3%	4.5%	7.1%
High Point Township	82,726	46.2%	38.6%	0.4%	0.0%	0.0%	7.3%	1.8%	11.7 %
Jamestown Township	13,322	73.0%	19.4%	0.7%	5.6%	0.0%	3.2%	6.0%	5.1%
Jefferson Township	11,221	60.8%	30.1%	0.0%	3.0%	0.0%	1.6%	2.3%	12.0 %
Madison Township	6,047	73.1%	10.1%	0.2%	2.8%	0.0%	3.2%	3.2%	3.9%
Monroe Township	11,761	60.3%	29.3%	0.1%	0.3%	0.0%	0.0%	16.2 %	15.2 %
Morehead Township	207,865	54.2%	31.9%	0.5%	1.3%	0.0%	5.3%	3.7%	7.6%
Oak Ridge Township	14,139	78.1%	6.7%	0.1%	6.4%	0.1%	2.6%	4.3%	5.3%
Rock Creek Township	15,771	66.2%	27.0%	0.1%	7.0%	0.1%	2.5%	5.3%	2.8%
Sumner Township	10,326	62.2%	20.7%	2.9%	2.2%	0.0%	1.3%	3.1%	15.3 %
Washington Township	3,118	91.1%	7.5%	0.0%	3.2%	0.0%	8.5%	2.5%	0.3%

Source: U.S. Census Bureau, ACS, 2021 5-Year Estimates, B02001 and B03002 files

Table 6 reviews the percentage of the population living in poverty in 2021 for each township within Guilford County and at the state level. Morehead Township, which is at 14.8% for

poverty status, is slightly higher than both the county and state percentages. Gilmer and High Point Townships have the highest levels of poverty in the county.

Table 6. Poverty Status for Townships in Guilford County and North Carolina State, 2021

	Total Population	Population Below Poverty Level	Percent Below Poverty Level
Bruce Township	10,796	1,247	11.6%
Center Grove Township	8,826	162	1.8%
Clay Township	6,858	297	4.3%
Deep River Township	22,367	892	4.0%
Fentress Township	11,480	759	6.6%
Friendship Township	8,919	666	7.5%
Gilmer Township	81,878	19,609	23.9%
Greene Township	3,559	495	13.9%
High Point Township	78,200	78,200	18.2%
Jamestown Township	13,229	1,014	7.7%
Jefferson Township	11,156	1,363	12.2%
Madison Township	6,023	396	6.6%
Monroe Township	11,725	1,300	11.1%
Morehead Township	198,950	29,376	14.8%
Oak Ridge Township	14,079	439	3.1%
Rock Creek Township	15,731	1,789	11.4%
Sumner Township	10,303	783	7.6%
Washington Township	3,039	348	11.5%
Guilford County	517,118	75,142	14.5%
North Carolina State	10,092,759	1,379,672	13.70%

Source: U.S. Census Bureau, ACS, 2021 5-Year Estimates, S1701 file

3.12.3 Children's Environmental Health and Safety

Table 7 presents 2021 data on the total population of children in a range of ages under 5 years old through age 19 within the 18 Townships in Guilford County, NC.

Table 7. Total Population of Children in Guilford County, 2021

Geography	Total population	Under 5 years old	5 to 9 years old	10 to 14 years old	15 to 19 years old	Percentage
Bruce Township	10,809	634	635	706	757	25.3%
Center Grove Township	8,826	255	594	992	976	31.9%
Clay Township	6,862	301	364	338	608	23.5%
Deep River Township	22,641	1,478	1,475	1,313	1,514	25.5%
Fentress Township	11,583	238	747	426	651	17.8%
Friendship Township	8,919	569	302	460	550	21.2%

Geography	Total population	Under 5 years old	5 to 9 years old	10 to 14 years old	15 to 19 years old	Percentage
Gilmer Township	87,618	6,509	6,421	5,975	8,284	31.0%
Greene Township	3,559	265	298	146	179	24.9%
High Point Township	82,726	5,333	4,895	5,365	6,772	27.0%
Jamestown Township	13,322	576	711	592	683	23.9%
Jefferson Township	11,221	512	622	828	790	24.5%
Madison Township	6,047	214	273	424	333	20.5%
Monroe Township	11,761	829	607	1,329	860	30.8%
Morehead Township	207,865	11,121	12,607	12,507	15,253	24.8%
Oak Ridge Township	14,139	550	916	1,477	1,332	30.2%
Rock Creek Township	15,771	994	1,110	1,036	1,146	27.2%
Sumner Township	10,326	466	468	701	720	22.8%
Washington Township	3,118	154	100	222	156	20.2%
Guilford County	542,410	30,616	32,359	35,737	43,056	26.1%
North Carolina	10,551,162	582,801	617,727	689,760	709,711	24.6%

Source: U.S. Census Bureau, ACS, 2021 5-Year Estimates, DP05 file

3.13 VISUAL EFFECTS

FAA Order 1050.1F directs FAA to consider the extent to which lighting associated with a proposed action creates an annoyance or interferes with normal activities among people in the vicinity. In addition, the order directs FAA to consider the extent to which the proposed development contrasts with the existing environment, in a visual or aesthetic nature of the area, and whether the agency considers this contrast objectionable, or whether it interferes with the viewshed criteria in the area.

The proposed project site is located just off airport property in Greensboro, North Carolina. The proposed location is south of Cessna Drive, within the city limits of Greensboro, approximately nine miles west of downtown and ½-mile southwest of GSO airport property boundary. The areas immediately surrounding the proposed location consist of industrial properties and roadways. To the north of the site is Cessna Drive, industrial properties, and within a half mile, the GSO Airport. To the immediate south, east, and west of the site, are more industrial and commercial properties (see Figures 2 and 3). The site is approximately nine miles west of downtown Greensboro.

3.14 WATER RESOURCES

3.14.1 Wetlands

Federal agencies are required to comply with provisions of the Clean Water Act (33 U.S.C. §§ 1251-1387) in any action that may affect water quality, including the control of any discharge into surface or ground water and the prevention or minimization of loss of wetlands. EO 11990, *Protection of Wetlands*, directs Federal agencies to “avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.”

Wetlands are regulated in North Carolina via the Clean Water Act, which is administered by the U.S. Army Corps of Engineers (USACE); and through the North Carolina Administrative Code provisions for permits, surface water and wetland standards, and riparian buffers, which are administered by NCDEQ.

A wetlands map was obtained from the National Wetlands Inventory (NWI) website (<http://wetlands.fws.gov/>). A freshwater forested/shrub wetland associated with a tributary to the East Fork Deep River is located approximately 560 feet south of the proposed project site. No wetlands are located within the proposed project site.

Figure 5. NWI Map for Proposed Project Site



3.14.2 Floodplains

EO 11988, *Floodplain Management*, and EO 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*, directs Federal agencies to take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in any of its actions. DOT Order 5650.2, *Floodplain Management and Protection*, implements EO 11988 by requiring agencies to evaluate the potential effects of any actions they may take in a 100-year floodplain.

According to a review of the Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map (FIRM) for the City of Greensboro, there are no floodplains near the proposed project site. According to the map (3710781500J, October 2020), the proposed project site lies within Zone X, which are areas determined to be outside the 0.2% annual chance floodplain (i.e., the 500-year flood).

3.14.3 Surface Water and Groundwater

Agencies must comply with the Fish and Wildlife Coordination Act if the proposed action impounds, diverts, drains, controls, or otherwise modifies the waters of any stream or other water body. Section 1424(e) of the Safe Drinking Water Act (42 U.S.C. §§ 300(f) - 300j-26), requires consultation with the EPA if a proposed action has the potential to contaminate an aquifer designated by the EPA as a sole or principal source of drinking water for the area.

A tributary to the East Fork Deep River is located approximately 0.2-mile northwest of the proposed project site and the project site is within the watershed of the East Fork Deep River. This river has a classification of WS-IV:* and it is within the Cape Fear river basin and in the Upper Randleman Lake Water Supply Watershed.

The NCDEQ Division of Water Resources assigns to each surface water in North Carolina a primary classification. All waters must meet the standards for Class C (fishable/swimmable) waters. The other primary classifications provide additional levels of protection for primary water contact recreation (Class B) and drinking water (Water Supply Class I through V). Water Supply Class IV (WS-IV) means waters used as sources of water supply for drinking, culinary or food processing purposes where a WS-I, WS-II or WS-III classification is not feasible. These waters are also protected for Class C uses. WS-IV waters are generally in moderately to highly developed watersheds.

The asterisk symbol (*) in the classification of rivers in the Cape Fear basin identifies waters that are within a designated Critical Supply Watershed and are subject to a special management strategy specified in 15A North Carolina Administrative Code (NCAC) 2B.0248. These rules (i.e., the Randleman nutrient strategy rules) apply to the entire drainage area upstream of the Randleman Lake Dam. The rules require local governments to implement the rules via stormwater management plans, restrictions on no new or expanding permitted wastewater discharges, and provisions to protect existing riparian buffers.

The City of Greensboro Stormwater Management Program within the Water Resources Department implements the city's Stormwater Management Ordinance. A key objective of this ordinance is to protect properties from potential stormwater quantity and quality problems. To control the adverse effects of increased stormwater runoff associated with newly developed or redeveloped sites, City Code of Ordinance Chapter 27 requires all new development within the city limits to submit a Stormwater Management Plan.

3.14.4 Wild and Scenic Rivers

The Wild and Scenic River Act (16 U.S.C. §§ 1271-1287) creates the National Wild and Scenic Rivers System to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations.

There are no wild and scenic rivers within or near the proposed project site.

4.0 ENVIRONMENTAL CONSEQUENCES

This chapter of the EA examines the possible impact to the affected environment as described in Chapter 3 for both the Preferred and No Action Alternatives. All impacts of the Proposed Action are examined for each resource category as specified in FAA Order 1050.1F and the CEQ Regulations. Additionally, cumulative impacts of the Proposed Action and any past, present, and reasonably foreseeable future actions are evaluated for each of the impact categories following the no action and preferred analyses, except for the coastal resources category. The alternatives would have no impact on this resource category because there are no coastal resources in Guilford County and will not be discussed in detail in this chapter.

Cumulative Impacts

The CEQ Regulations implementing the procedural provisions of NEPA defines cumulative effects as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other action" (40 CFR §1508.7).

NEPA requires that cumulative effects be evaluated along with the direct and indirect effects of the actions. The No Action Alternative serves as the reference point against which to evaluate cumulative effects. A description of past, present, and reasonably foreseeable future actions is included in the following paragraphs.

Past Actions

The proposed project site was historically used for agriculture. Based on a review of historical aerial photos, the parcel was completely covered with trees in 1993. Development of adjacent parcels and the removal of majority of trees on the parcel were completed by 1999. The parcel was never developed nor excavated.

Present and Reasonably Foreseeable Actions

Reasonably foreseeable actions by FAA at the proposed project include the future operations of the facility. Other projects could potentially occur in the undeveloped areas adjacent to the site, such as private commercial and industrial developments. However, the extent of future development adjacent the project area is not known at this time.

The proposed project site is located 10,000 feet from the approach landing system located at the southwest corner of the PTAA. The 2010 PTAA Airport Master Plan Update and Strategic Long-Range Visioning Plan summarized planning considerations for the next 20 years. There is a potential expansion to the northwest because it would impose the least amount of social and environmental impacts and would be the most cost effective to achieve. Expansion to the southwest and southeast is constrained because of existing network of surface transportation which includes the Western Urban Loop, Interstate 40, and the Norfolk Southern Railroad Rail Line. There are no reasonably foreseeable actions by FAA or PTAA that would compromise the operations of the proposed project site.

The City of Greensboro released *GSO2040*, a comprehensive plan for Greensboro's shared vision of projects, programs, and policies. *GSO2040* includes maps characterizing current conditions and anticipated growth for the Greensboro metropolitan area. According to the Comprehensive Plan Map, the proposed project site is an existing planned industrial area. The Norfolk Southern Railroad line is located 2,800 feet north of the proposed project site and identified as a "reinvestment transportation corridor." There are no other planned efforts within half a mile of the proposed project site.

4.1 AIR QUALITY

FAA Order 1050.1F defines significant air quality impacts as those where the agency project or action would result in an exceedance of one or more of the NAAQS or any state or local standards for any of the time periods analyzed or increase the frequency or severity of any such violations (Section 4-3.3). The Greensboro-Winston-Salem-High Point nonattainment area was re-designated as attainment status on December 22, 2010.

Preferred Alternative

There is no anticipated increase in operational emissions from the Proposed Action. The Proposed Action would result in only minor temporary impacts to air quality from construction activities during development of the project site. Emission sources from construction include exhaust emissions from construction equipment, haul trucks, and construction worker commuting. Minor tree removal, grounds clearing, and grading will be necessary to further clear the lots to allow development of the Proposed Action. Therefore, the Proposed Action is not anticipated to have a significant impact on this resource category.

No Action

Under this alternative, the proposed site would remain in its current state. No construction work would be performed. Therefore, air quality conditions would not be affected beyond those described in Chapter 3, Affected Environment.

Cumulative Impacts

There are no reasonably foreseeable construction activities in the vicinity of the proposed project site other than the Proposed Action. Therefore, the incremental, temporary increase in emissions from the Proposed Action, when added to all the emission sources in the vicinity, would not produce a significant cumulative impact on air quality.

4.2 BIOLOGICAL RESOURCES

Federal agencies are required to assess potential impacts from agency actions to fish, wildlife, and plants and their habitats under several Federal laws, EOs and regulations. Section 7 of the ESA mandates Federal agencies to avoid actions that will harm species and their critical habitat. Agencies must review their actions and determine whether the action may affect Federally listed and proposed species or proposed or designated critical habitat. Agencies must coordinate with USFWS to determine if species and or critical habitat may be in the project area. This section also addresses state-listed threatened or endangered species and their habitats.

Preferred Alternative

The proposed project site is an undeveloped vacant parcel. In accordance with Section 7 of the ESA, FAA reviewed the USFWS IPaC planning tool (see Section 8 for website reference information) for Federally endangered, threatened, proposed, and candidate species and consulted with USFWS and the North Carolina Heritage Program. FAA concluded that the Proposed Action will have no effect on federal- and state-listed species and that suitable habitat is absent for listed, proposed, or candidate species within the proposed project site. The FAA submitted a consultation package through the IPaC Planning tool on November 18, 2022 (updated July 3, 2023), to the USFWS Raleigh Field Office; the consultation package documentation is included in Appendix B.

No impacts to migratory birds or Bald or Golden Eagles or their habitat are anticipated. If any migratory birds and eagles, their eggs, or nests are observed at the project site, then FAA will postpone the project until the nests are inactive and will complete the permit process with USFWS to remove any inactive nests.

Site grading and tree removal will be mitigated through the City of Greensboro Planning Department site plan approval process or via the application for a tree disturbance permit.

No Action

Under this alternative, the project site would remain in its current state. No impacts to biological resources would be expected under this alternative.

Cumulative Impacts

There are no reasonably foreseeable impacts activities at the proposed project site area other than the Proposed Action and future facility operations. No cumulative impacts to biological resources would be expected.

4.3 CLIMATE

As discussed in Chapter 3, Affected Environment, GHG emissions are used as a reasonable proxy for assessing potential climate impacts and provide decision makers and the public with useful information for a reasoned choice among alternatives.

Preferred Alternative

The Proposed Action would increase GHG emissions over the No Action Alternative. The Proposed Action will use an estimated 61,000 kWh of electricity annually. Using the EPA's 2020 eGRID Data Explorer for CO₂ total output emission rate for North Carolina, the GHG emissions associated with that level of electricity usage are estimated at 17.85 metric tons of CO_{2e} annually. For comparison, in 2017 the local utility, Duke Energy Carolinas, supplied approximately 92 million Megawatt hours of electricity. Therefore, this estimated annual electricity will have a negligible impact.

The Proposed Action is in a geographic area vulnerable to increased heat, risk of hurricanes, and flooding. While climate and weather events are likely to intensify, it is not expected to impact MASA operations and deployment in the climatological norm.

No Action

Under the No Action Alternative, the project site would remain undeveloped, and electricity use and associated GHG emissions would remain consistent with current levels.

Cumulative Impacts

All GHG emissions contribute to cumulative climate change impacts. However, as noted by CEQ, the analysis of the effects of GHG emissions is essentially a cumulative effects analysis that is subsumed within the general analysis and discussion of climate change impacts. Therefore, direct and indirect effects analysis for GHG emissions adequately addresses the cumulative impacts for climate change from the Proposed Action and its alternatives and a separate cumulative effects analysis for GHG emissions is not needed.

4.4 DOT ACT, SECTION 4(F)

A property must be a significant resource for Section 4(f) to apply. Section 4(f) of the DOT Act and its implementing regulations provide that the Secretary of Transportation may not approve any program or project that requires the use of the following properties:

- Parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public;
- Publicly owned wildlife and waterfowl refuges of national, state, or local significance that are open to the public; and
- Historic sites of national, state, or local significance in public or private ownership regardless of whether they are open to the public.

Use of these properties is not allowed unless there is no feasible and prudent alternative to the use of such land and such program, and the project includes all possible planning to minimize harm resulting from the use.

The Proposed Action does not involve the physical nor constructive use of any Section 4(f) property. As discussed in other sections of this report, the air pollution, water pollution, noise, and other impacts of the Proposed Action are negligible, and there are no Section 4(f) properties within or in the vicinity of the proposed project site.

Preferred Alternative

The proposed project site is an undeveloped parcel. The site is bound by roadways and land zoned and developed for commercial and industrial use. The Preferred Alternative will not adversely impact publicly owned land subject to Section 4(f) of the DOT Act.

No Action

Under the No Action Alternative there would be no additional impact to publicly owned land subject to Section 4(f) of the DOT Act.

Cumulative Impacts

There are no reasonably foreseeable construction activities at the proposed project site other than the Proposed Action and future facility operations. No cumulative impacts to publicly owned land subject to Section 4(f) of the DOT Act would be expected.

4.5 FARMLANDS

The FPPA directs Federal agencies to identify and take into account the adverse effects of Federal programs on the preservation of farmland. The Federal agencies are also directed to consider alternative actions that could lessen such adverse effects and assure that Federal programs, to the extent practicable, are compatible with state, unit of local government, and private programs and policies to protect farmland.

Preferred Alternative

The proposed project activities will not convert any prime or unique farmland, or farmland of state or local importance, as defined by the USDA NRCS, to a nonagricultural use. While the proposed project site has soils that normally may be considered statewide important farmland soils based on their land capability classifications, the site is not usable as farmland since it is a parcel of less than two acres surrounded by commercial and industrial development and roadways. Based on a review of historical aerial photos, the proposed project site has been undeveloped.

No Action

The No Action Alternative does not include any land acquisition or construction activities. Therefore, no significant impacts to farmlands would be anticipated under this alternative.

Cumulative Impacts

As stated above, the Proposed Action does not convert usable farmland to nonagricultural use. Therefore, the Proposed Action would not contribute to cumulative adverse effects on farmland.

4.6 HAZARDOUS MATERIALS, SOLID WASTE, AND POLLUTION PREVENTION

Hazardous waste impacts are typically associated with the current or future use, transfer, or generation of hazardous material within the limits of the proposed improvements or the acquisition of properties that contain hazardous materials.

Environmental concerns related to solid waste disposal range from adequate landfills for normal urban trash and garbage to the safe disposal of industrial waste. A GSO MASA warehouse facility does not generate appreciable amounts of solid waste as part of normal operations.

Preferred Alternative

The operation of the GSO MASA warehouse will generate typical solid waste based on daily usage of the warehouse and office spaces. The Proposed Action would result in only minor temporary additional use of hazardous materials and generation of wastes from construction activities. The waste primarily expected to be generated during construction is scrap metal, which is largely recyclable, building materials, and small amounts of concrete construction waste. All waste will be handled, transported, recycled or landfilled in accordance with all

applicable regulations. The mobile equipment to be stored at the GSO MASA warehouse will be fueled offsite; no fuel dispensing equipment will be installed at the facility. Therefore, the Proposed Action is not anticipated to have a significant impact on this resource category.

No Action

Under this alternative, the proposed site would not be developed, and the existing land would remain abandoned as is. No hazardous waste or solid waste impacts are expected under this alternative.

Cumulative Impacts

Construction of the proposed project and development within the surrounding area could result in the increased use hazardous materials and generation of greater amounts of solid and hazardous wastes. There are no reasonably foreseeable construction activities other than the proposed project, and there is no general trend of growth and development in the area. Therefore, the incremental, temporary increase in waste from the Proposed Action, when added to the waste sources in the vicinity, would not produce a significant cumulative impact on hazardous materials and solid waste.

4.7 HISTORICAL, ARCHITECTURAL, ARCHAEOLOGICAL, AND CULTURAL RESOURCES

FAA Order 1050.1F states that based on regulations at 36 CFR §800.8(a), a finding of adverse effect to historic, architectural, archaeological or cultural resources does not necessarily constitute a significant impact. The Section 106 process includes consideration of alternatives to avoid adverse impacts, consideration of mitigation measures and acceptance of adverse impacts on National Register listed or eligible properties; considerations of mitigation measures and acceptance of adverse effects in some cases. In all cases, FAA makes the final determination on level of effect in consultation with the Advisory Council on Historic Preservation (ACHP), SHPO or THPOs.

Consultation was initiated with North Carolina SHPO through a letter dated December 7, 2022, and the SHPO provided a response dated January 19, 2023.

Preferred Alternative

According to the North Carolina SHPO, no known historical sources are within the proposed project site and it is unlikely that any archaeological resources that may be eligible for inclusion in the NRHP will be affected by the project. Via a letter dated January 19, 2023, the SHPO they have no comment on the proposed project. Consultation with Federally recognized Tribes has not resulted in the identification of any resources of cultural significance within the proposed project area, although consultation is ongoing. One Tribe, the Muscogee (Creek) Nation, requested immediate notification if there is any inadvertent discoveries of cultural material (i.e. artifacts) and/or human remains and/or funerary objects during ground disturbance work. See Appendix B for copies of correspondence between FAA and the SHPO and THPOs.

Implementation of the Preferred Alternative is expected to have no impacts on historic or cultural resources and the viewshed from the NRHP-listed resource has been previously altered by non-historic road construction and the previous construction of non-historic residential structures in

the area of the proposed undertaking (that were subsequently removed), and a large industrial site immediately east of the proposed project site. If project activities lead to the discovery of any culturally significant item, FAA would immediately notify the SHPO and the Federally recognized Tribes.

No Action

The No Action Alternative would not have the potential to cause impacts to historic or cultural resources.

Cumulative Impacts

One NRHP-listed or eligible historic resources, or other resources of cultural significance, was previously identified within the APE or during ongoing consultation with the SHPO and Federally recognized Tribes. As discussed above, the viewshed from the NRHP-listed resource has been previously altered. Therefore, implementation of the Proposed Action and the operation of the MASA facility would not contribute to cumulative impacts on historic or cultural resources.

4.8 LAND USE

Section 1502.16(c) of the CEQ Regulations requires agencies to reconcile its action with Federal, regional, state, and local land use plans, policies and controls for the area concerned. According to City of Greensboro zoning maps, there is an airport overlay zoning restriction within the 60 db DNL.

Preferred Alternative

The Proposed Action is to develop vacant land leased by FAA for light industrial use. The Preferred Alternative is consistent with local zoning requirements and restrictions on land use agreed to by the FAA for GSO.

No Action

The No Action Alternative does not include any changes in land use. Therefore, no significant impacts to land use would be anticipated under this alternative.

Cumulative Impacts

As stated above, the Proposed Action consistent with City of Greensboro land use plans. Therefore, the Proposed Action would not contribute to cumulative adverse effects on land use.

4.9 NATURAL RESOURCES AND ENERGY SUPPLY

FAA Order 1050.1F defines specific impact thresholds for natural resources and energy supply as those actions in which demand would exceed the available supply of these resources. Factors to consider are: when the action would cause a sustainable demand on available energy or natural resource supplies when compared to future no impact conditions; changes in aircraft movement or ground vehicle use would cause a statistically significant increase in fuel consumption; when consumable natural resources for construction are rare; and when the action would not be

consistent with smart growth requirements of the agency having jurisdiction over the area where the airport is located.

Preferred Alternative

The Proposed Action would result in a moderate increase in demand on energy utilities, water supplies, and natural resources. The energy supply for the GSO MASA site consists of electricity supplied by Duke Energy Carolinas. Nonrefrigerated warehouses in the U.S. use an average of 6.1 kWh of electricity per square foot annually. The GSO MASA warehouse will use an estimated 61,000 kWh of electricity annually. The City of Greensboro will provide water and sewer service upon request for the subject site. The proposed site is located off current airport property therefore changes in aircraft fuel usage are not anticipated under this alternative. Electrical and water utilities at the Proposed Action will have a nominal impact on this resource category.

No Action

There would be no significant impacts to this resource category from the No Action Alternative which leaves the site in its current condition.

Cumulative Impacts

The cumulative impact from the Proposed Action and past, present, and reasonably foreseeable actions in the vicinity of the GSO MASA site are not likely to exceed the available supply of natural resources or energy supply in the area, and thus would not significantly impact natural resources or energy supply.

4.10 NOISE AND NOISE-COMPATIBLE LAND USE

FAA Order 1050.1F states that a significant noise impact would occur if the proposed project would cause noise sensitive areas to experience an increase in noise by 1.5 decibels (dB) or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe. The proposed project site is inside of the 60 DNL noise exposure contour.

Preferred Alternative

The Preferred Alternative would not affect the type, number, or routes of aircraft operations in the airspace over the proposed project site. Therefore, it is anticipated that there would be no change to aircraft noise patterns or levels.

Noise impacts due to facility construction and future operations would be primarily limited to the noise generated by the equipment at the site and the noise associated with the traffic to and from the site. Noise levels generated by construction and operational traffic would generally not be higher than those produced by normal traffic flows. The increase in road traffic due to the construction/demolition operations and the trucks that carry the materials to the site generally increase the noise levels adjacent to the road system. Construction activities are anticipated to occur during the daytime hours and would be temporary. Mobile NAS equipment will primarily

be staged at the facility and operation noise generated will be nominal. Therefore, the additional project-related road traffic and noise should not represent a significant impact.

No Action

The No Action Alternative would result in no construction activities and no change in the currently abandoned lots. Therefore, there would be no effect on noise levels.

Cumulative Impacts

The cumulative impact from the Proposed Action and past, present, and reasonably foreseeable actions in the vicinity of the GSO MASA site are not likely to produce a significant effect on noise levels.

4.11 SOCIOECONOMICS, ENVIRONMENTAL JUSTICE, AND CHILDREN'S ENVIRONMENTAL HEALTH AND SAFETY

FAA Order 1050.1F defines significant impacts to environmental justice as disproportionately high and adverse human health or environmental effects on minority or low-income populations. The Order provides examples of significant socioeconomic impacts that include but are not limited to: 1) extensive relocation of residents is required, but sufficient replacement housing is unavailable; 2) extensive relocation of community business that would create severe economic hardship for the affected communities; 3) disruptions of local traffic patterns that substantially reduce the service levels of roads serving the airports and surrounding communities; and 4) a substantial loss in community tax base.

Preferred Alternative

There would be no anticipated significant human health or environmental effects that would result from the implementation of the Proposed Action, and none that would occur disproportionately to minority or low-income populations. There would also be no impact anticipated to children's health or safety risks. While the FAA will lease the proposed project site, no real property would be acquired, and no persons would be displaced as a result of the proposed action, as defined in Section 4601 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act. No relocation of commercial businesses would occur as a result of the Proposed Action.

No Action

There would be no impacts to socioeconomic, environment justice, or children's health and safety risks under the No Action Alternative.

Cumulative Impacts

The cumulative impact from the Proposed Action and past, present, and reasonably foreseeable actions in the vicinity of the GSO MASA site are not likely to produce a significant effect on socioeconomic, environmental justice, or children's health and safety issues.

4.12 VISUAL EFFECTS

FAA 1050.1F Desk Reference details that visual effects deal broadly with the extent to which the proposed action or alternative(s) would either: 1) produce light emissions that create annoyance or interfere with activities; or 2) contrast with, or detract from, the visual resources and/or the visual character of the existing environment. Visual effects can be difficult to define and assess because they involve subjectivity. Proposed aviation and aerospace actions do not commonly result in adverse visual effects, but these effects may occur in certain circumstances. For clarity and uniformity, visual effects are broken into two categories: 1) *Light Emission Effects*; and 2) *Visual Resources and Visual Character*. These two categories are defined in more detail below.

Light Emissions

Light emissions include any light that emanates from a light source into the surrounding environment. Examples of sources of light emissions include airfield and apron flood lighting, navigational aids, terminal lighting, parking facility lighting, roadway lighting, safety lighting on launch pads, additional lighting to support nighttime commercial space launches, and light generated from such launches.

Visual Resources and Visual Character

Visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics. Visual resources may include structures or objects that obscure or block other landscape features. In addition, visual resources can include the cohesive collection of various individual visual resources that can be viewed at once or in concert from the area surrounding the site of the proposed action or alternative(s). In unique circumstances, the nighttime sky may be considered a visual resource.

Visual character refers to the overall visual makeup of the existing environment where the proposed action and alternative(s) would be located. For example, areas in close proximity to densely populated areas generally have a visual character that could be defined as urban, whereas less developed areas could have a visual character defined by the surrounding landscape features, such as open grass fields, forests, mountains, or deserts, etc.

Preferred Alternative

The Proposed Action would have no impact on the light emissions and visual aesthetics of the area. The proposed GSO MASA would have no additional lights associated with the building, aside from normal outside lights which will illuminate in the dark. The area is already industrialized and there are other light sources at night in the surrounding area. The building would also not cause any additional visual aesthetics since that area is already industrialized with additional buildings and trailers adjacent to the property.

No Action

This alternative would have no impact to the light emissions or visual aesthetics, as the property is currently vacant.

Cumulative Impacts

There are many light emissions and other visual aesthetics that are in operation at GSO, about a half mile away. There would be no additional cumulative impacts to the light emissions, visual nature and aesthetics to the area by building the MASA in this location. The area is already industrialized in the immediate area and downgrade from Regional Road, so the visual aesthetics would be minimized and not affect the area further. Any increase of light emissions or visual aesthetics during the construction of the MASA would be temporary and not cause any additional effects. Therefore, this action does not present a significant cumulative impact.

4.13 WATER RESOURCES

Water quality can be adversely impacted by several means including: construction activities, storm water discharges from impervious surfaces, accidental releases of hazardous substances, and maintenance activities. Potential construction impacts include disturbance from earth moving and grading and accidental discharge of contaminants such as fuels and lubricating oils used for construction machinery. There are no wild and scenic rivers on or near the proposed project site.

Preferred Alternative

Increased surface water runoff is anticipated due to the increase in impervious areas from the Proposed Action. The Proposed Action does not involve the construction of, or any encroachment on any perennial or intermittent streams or tributaries, nor does it involve the impoundment, diversion, channel deepening or other modification of a stream or body of water. It does not involve impacts to wetlands, floodplains, and wild and scenic rivers. During proposed action construction actions, an increase in erosion and sedimentation could occur. However, any such increase would be only temporary and limited in spatial extent as the proposed project site is more than one quarter mile from any surface water body. The following standard “best management practices” (BMPs) would be implemented to reduce potential erosion. The rear of the proposed project site is a riparian zone that will remain undisturbed the during construction and standard operations. Required stormwater permit applications will be assessed and submitted if the construction is greater than one acre. A Stormwater Pollution Prevention Plan will be developed and implemented as necessary. If signs of erosion were observed, erosion control efforts would be revised and/or increased. Following project construction, all sediment controls would be removed (along with any accumulated sediment) and disposed of in an off-site location.

Site grading and addition of impervious surfaces impacting stormwater will be mitigated through the City of Greensboro Water Resources Department site plan approval process and via the submittal of a Stormwater Management and Erosion Control Plan. The development and operation of the GSO MASA facility will comply with all City of Greensboro requirements implemented in accordance with the Randleman Lake nutrient strategy (i.e., special management strategy).

No Action

The No Action Alternative does not propose construction of any facilities. Therefore, no significant water resources impacts would be expected under the No Action Alternative.

Cumulative Impacts

There are no reasonably foreseeable construction activities at the GSO MASA site other than the Proposed Action. No cumulative impacts to water resources would be expected.

5.0 FINDINGS AND CONCLUSIONS

It has been determined that the Proposed Action would have the following impacts on environmental and social resources:

Category	Environmental Impact of Preferred Alternative	Environmental Impact of No Action	Cumulative Impacts of Preferred Alternative	Mitigation Measures and Permits Required for Preferred Alternative
Air Quality	No significant impact	No impact	No cumulative impact	None
Biological Resources	No significant impact	No impact	No cumulative impact	City of Greensboro Planning Department approved site plan or tree disturbance permit
Climate Change	No significant impact	No impact	No cumulative impact	None
Coastal Resources	N/A	N/A	N/A	N/A
DOT Act, Section 4(f)	No significant impact	No impact	No cumulative impact	None
Farmlands	No significant impact	No impact	No cumulative impact	None
Hazardous Materials, Solid Waste, and Pollution Prevention	No significant impact	No impact	No cumulative impact	All waste will be handled, transported, recycled or landfilled in accordance with all applicable regulations.
Historical, Architectural, Archaeological, and Cultural Resources	No significant impact	No impact	No cumulative impact	Notification to SHPO and THPOs of any discovery of culturally significant items.
Land Use	No significant impact	No impact	No cumulative impact	None
Natural Resource and Energy Supply	No significant impact	No impact	No cumulative impact	None
Noise and Noise-Compatible Land Use	No significant impact	No impact	No cumulative impact	None

Category	Environmental Impact of Preferred Alternative	Environmental Impact of No Action	Cumulative Impacts of Preferred Alternative	Mitigation Measures and Permits Required for Preferred Alternative
Socioeconomics, Environmental Justice, and Children's Health and Safety Risks	No significant impact	No impact	No cumulative impact on EJ; no cumulative impact on socioeconomics	None
Visual Effects	No significant impact	No impact	No cumulative impact	None
Water Resources	No significant impact	No impact	No cumulative impact	Construction BMPs will be implemented to protect water quality; submittal of Stormwater Management & Erosion Control Plan to the City of Greensboro Water Resources Department

6.0 PUBLIC PARTICIPATION

Consultation with local, state and Federal agencies, and the appropriate Indian Tribes was conducted to determine the potential for impacts to specific resources, as documented in Chapter 4.0, Environmental Consequences. This document will be available in English for public review for 30 days at the City of Greensboro Central Library and a Notice of Availability (NOA) of this EA will be published in the Greensboro News & Record. During this time, public comments are welcome regarding the findings in this document.

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This section of the EA lists the people responsible for its preparation.

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8.0 RESOURCES

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<https://www.gpo.gov/fdsys/pkg/USCODE-2015-title16/html/USCODE-2015-title16-chap33.htm>

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Farmland Protection Policy Act (FPPA), 7 USC §§ 4201-4209,
<https://www.gpo.gov/fdsys/pkg/USCODE-2015-title7/html/USCODE-2015-title7-chap73.htm>

Fish and Wildlife Coordination Act, 16 U.S.C. §§ 661-667d,
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Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. § 1801 et seq.,
<https://www.gpo.gov/fdsys/pkg/USCODE-2015-title16/html/USCODE-2015-title16-chap38.htm>

Marine Mammal Protection Act (MMPA), 16 U.S.C. § 1361 et seq.,
<https://www.gpo.gov/fdsys/pkg/USCODE-2015-title16/html/USCODE-2015-title16-chap31.htm>

Migratory Bird Treaty Act, 16 U.S.C. § 703 et seq., <https://www.gpo.gov/fdsys/pkg/USCODE-2015-title16/html/USCODE-2015-title16-chap7-subchapII.htm>

National Environmental Policy Act (NEPA), 42 U.S.C. §4321 et seq.,
<https://www.gpo.gov/fdsys/pkg/USCODE-2014-title42/html/USCODE-2014-title42-chap55.htm>

National Historic Preservation Act (NHPA), 54 U.S.C. §§ 300101 et seq., <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title54/html/USCODE-2014-title54-subtitleIII.htm>

Noise Control Act of 1972, 42 U.S.C. §§ 4901-4918, <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title42/html/USCODE-2014-title42-chap65.htm>

North Carolina General Statute, Chapter § 113 Article 25, https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_113/GS_113-331.pdf

Resource Conservation and Recovery Act (RCRA) as amended by the Federal Facilities Compliance Act of 1992, 42 U.S.C. §§ 6901-6992k, <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title42/html/USCODE-2014-title42-chap82.htm>

Safe Drinking Water Act, 42 U.S.C. §§ 300f - 300j-26, <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title42/html/USCODE-2014-title42-chap6A-subchapXII.htm>

Wild and Scenic River Act, 16 U.S.C. §§ 1271-1287, <https://www.gpo.gov/fdsys/pkg/USCODE-2015-title16/html/USCODE-2015-title16-chap28.htm>

Uniform Relocation Assistance and Real Property Acquisition Policies Act, 42 U.S.C § 4601 et seq., <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title42/html/USCODE-2014-title42-chap61.htm>

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Executive Order 11990, *Protection of Wetlands*, 42 FR 26961, May 25, 1977. Accessed December 2022. <https://www.archives.gov/federal-register/codification/executive-order/11990.html>.

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Executive Order 13089, *Coral Reef Protection*, 63 FR 36151, July 2, 1998. Accessed December 2022. <http://www.gpo.gov/fdsys/pkg/FR-1998-06-16/pdf/98-16161.pdf>.

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APPENDIX A. SITE PHOTOGRAPHS AND PROPERTY SUMMARY MAP



Photo 1. Proposed GSO MASA site perspective facing south (8/30/2022)



Photo 2. Proposed GSO MASA site perspective facing north (8/30/2022)



Photo 3. Proposed GSO MASA site looking south from the intersection of Cessna Drive and Orville Wright Drive (8/30/22).

Property Summary Map

Guilford County, NC



Parcel Number	98138	Total Out Building Value	0
PIN	7815805774	Total Land Value	239200
Owner	BESSEMER IMPROVEMENT CO	Total Deferred Value	0
Owner History	Card Image	Bldg Card	
Mail Address	PO BOX 14220	Appraisal Model Code	
Mail City	GREENSBORO	Deed Data	1/23/1997
Mail State	NC	Neighborhood	7825I01
Mail Zip	27415	Property Type	IND
Property Address	7217 CESSNA DR	Structure Size	
Legal Description	24 PH B SEC 3 PB92-66 AIRPORT IN PK PL92-66	Lot Size	2.08
Deed	004500-00176	Year Built	
Plat	92-66	Bedrooms	
Condo		Bathrooms	
Total Assessed	239200	Grade	
Total Building Value	0		



Disclaimer: While every effort is made to keep information provided over the internet accurate and up-to-date, Guilford County does not certify the authenticity or accuracy of such information. No warranties, express or implied, are provided for the records and/or mapping data herein, or for their use or interpretation by the User.

Map Scale
1 inch = 125 feet
4/3/2023

Map source: ArcGIS Desktop: ESRI, USGS, FAA; to scale.

APPENDIX B. CONSULTATION DOCUMENTS



Federal Aviation Administration

Memorandum

Date: June 28, 2023

Project: Proposed Construction of Mobile Asset Staging Area (MASA), Greensboro,
North Carolina

Subject: Consultation Letter Enclosures

Prepared by: Jeff Furr & Molly Fritz, Booz Allen Hamilton

To eliminate duplication in this Environmental Assessment, the enclosure entitled "GSO Mobile Asset Staging Area (MASA), Greensboro, Guilford County, North Carolina, Summary of Proposed Action and Alternatives" included with the consultation letters provided in this Appendix B is included once, and not with each letter.

APPENDIX B-1. ENDANGERED SPECIES CONSULTATION



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Raleigh Ecological Services Field Office
Post Office Box 33726
Raleigh, NC 27636-3726
Phone: (919) 856-4520 Fax: (919) 856-4556



In Reply Refer To:
Project Code: 2023-0017226
Project Name: FAA GSO MASA Project

July 03, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). If your project area contains suitable habitat for any of the federally-listed species on this species list, the proposed action has the potential to adversely affect those species. If suitable habitat is present, surveys should be conducted to determine the species' presence or absence within the project area. The use of this species list and/or North Carolina Natural Heritage program data should not be substituted for actual field surveys.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- Migratory Birds

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Raleigh Ecological Services Field Office

Post Office Box 33726

Raleigh, NC 27636-3726

(919) 856-4520

PROJECT SUMMARY

Project Code: 2023-0017226

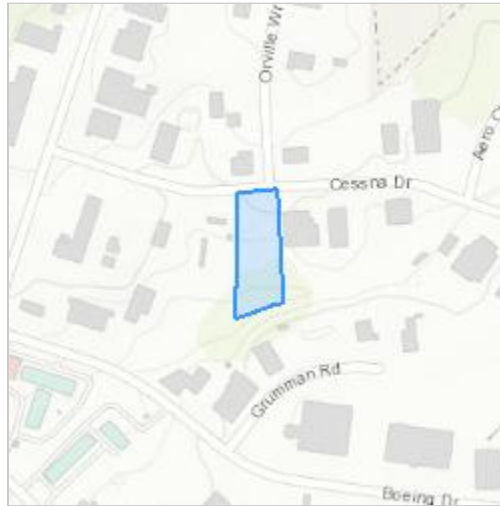
Project Name: FAA GSO MASA Project

Project Type: New Constr - Above Ground

Project Description: Proposed construction of a Mobile Asset Staging Area (MASA)

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@36.08374645,-79.9524249514541,14z>



Counties: Guilford County, North Carolina

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Schweinitz's Sunflower <i>Helianthus schweinitzii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3849	Endangered
Small Whorled Pogonia <i>Isotria medeoloides</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1890	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\)](#) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Jul 31
Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974	Breeds Apr 28 to Jul 20

NAME	BREEDING SEASON
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20
Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Prothonotary Warbler <i>Protonotaria citrea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee

was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (I)

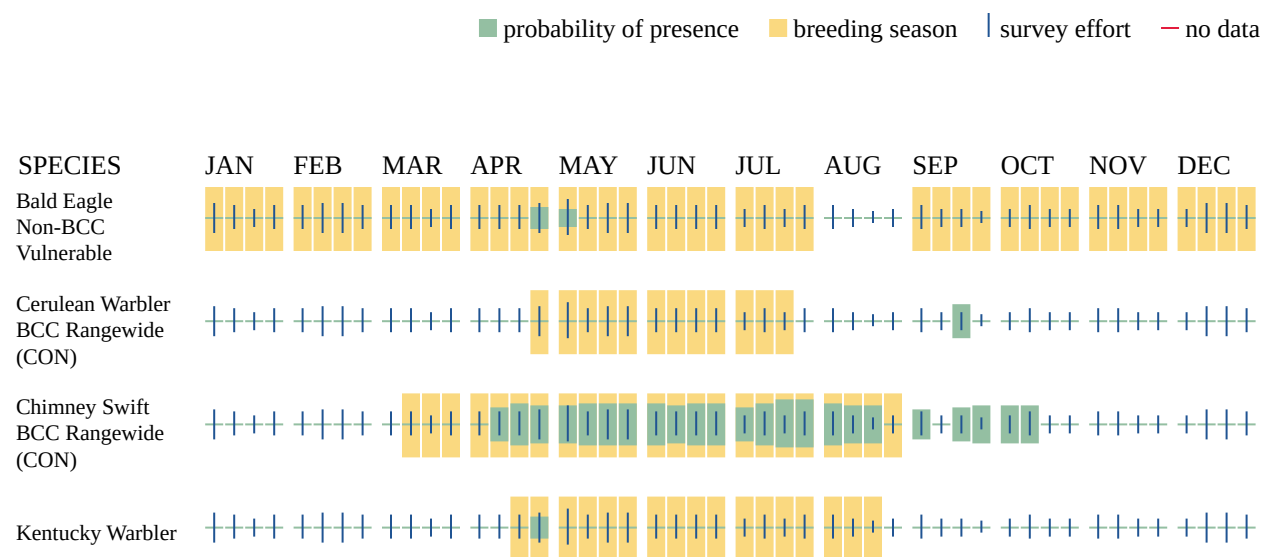
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (—)

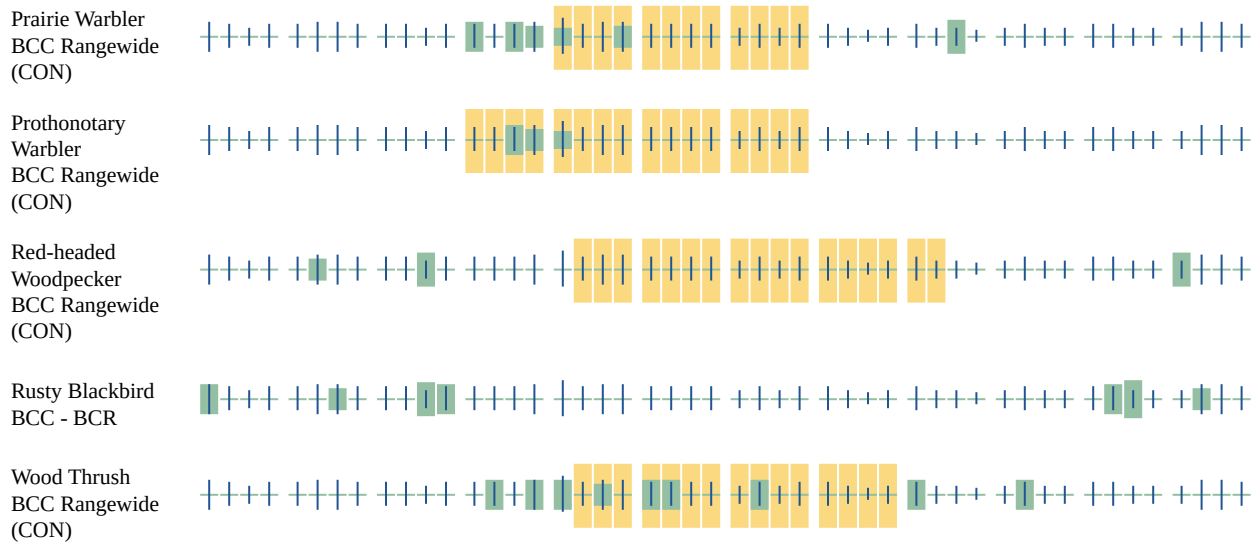
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



BCC Rangewide (CON)



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding,](#)

[and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can

implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

APPENDIX B-2. HISTORIC PRESERVATION CONSULTATION



U.S. Department
of Transportation
**Federal Aviation
Administration**

December 7, 2022

Ms. Renee Gledhill-Earley
Environmental Review Coordinator
State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

Subject: Addendum: Section 106 Project Review, FAA GSO MASA Project, Guilford County, ER 18-2687

Dear Ms. Gledhill-Earley:

This letter serves as an addendum to the North Carolina State Historic Preservation Office's (SHPO) review of the Federal Aviation Administration's (FAA) proposed undertaking GSO Mobile Asset Staging Area (MASA), Greensboro, Guilford County, North Carolina. The FAA's proposed undertaking is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, North Carolina. A project description and supporting visual documentation are included in the attached *Summary of Proposed Action and Alternatives*, and photographs of the project site are also attached. This addendum proposes a new project site at 7217 Cessna Drive, Greensboro, Guilford County.

The project site and its Area of Potential Effects (APE) were previously surveyed for historic resources in 2014 (ER 13-1261, 12/30/2014, GF 613.2 *Section 106 Determination: Piedmont Triad International Airport, Greensboro*, URS Corp., and ER 13-1261, 6/17/2014, GF 613.1 *ADDENDUM: Reconnaissance-Level Inventory of Potential Historic resources, Northwest Taxiway and Site Development, Piedmont Triad International Airport, Guilford County*, URS Corp.). The APE is defined as the parcels within which the construction would take place, and any surrounding properties from which the new MASA would be visible. No National Register (NRHP)-eligible historic properties were identified within the proposed project's APE.

This project will be federally funded by the FAA. The FAA will apply for and submit required documentation for commercial site development approvals and permits, such as the following:

- Commercial plan submittal to City of Greensboro Engineering & Inspections Department
- Grading/Erosion Control Plan
- Water and Sewer Connection Permit
- Site Plan Review by the City of Greensboro Planning Department.

If you have any questions or feedback concerning the project, or require any additional information, please feel free to contact Mr. Ankit Patel, Mobile Asset Sustainment Program Lead, AJW-2443, via mail (FAA National Headquarters, 800 Independence Ave SW, Orville Wright Bldg. (FOB 10A), Washington, DC 20591), email (ankit.patel@faa.gov), or phone at (202) 267-6095. In addition, you may contact our designated non-Federal representative, Mr. Jeff Furr, EOSH Professional, via email (jeff.ctr.furr@faa.gov) or phone at (202) 460-0587. We look forward to your comments within 30 days of your receipt of this letter and its attachments. If comments are not received from your office within 30 days, we will assume concurrence with our determination of no adverse effects.

Sincerely,

Ankit Patel
Mobile Asset Sustainment Program Lead

Enclosures:

GSO MASA; Summary of Proposed Action and Alternatives
FAA Mobile Asset Facility, Site Exhibit, Timmons Group
Site Photographs, FAA GSO MASA Facility

**GSO MOBILE ASSET STAGING AREA (MASA)
GREENSBORO, GUILFORD COUNTY, NORTH CAROLINA**

SUMMARY OF PROPOSED ACTION AND ALTERNATIVES

BACKGROUND

The Federal Aviation Administration (FAA) Mobile Asset Sustainment Program owns and maintains transportable National Airspace System (NAS) equipment that is used to restore air traffic operations during periods of extended equipment outages and to ensure continuity of NAS operations. Mobile NAS equipment provides for the continuity or restoral of air traffic control when an air traffic control tower (ATCT) or other NAS system is out of service due to a disaster or for non-routine maintenance, modernization, or upgrade. Mobile NAS equipment may also be required to augment air traffic control functions at some locations during major public events to ensure safe operations. Existing mobile NAS equipment is currently dispersed across the country, and the FAA lacks centralized locations for storage and maintenance of the equipment.

The FAA has determined the need to stage mobile NAS equipment at a location in the eastern United States to allow for rapid deployment of mobile assets to that part of the country. The purpose of the proposed action is to provide a facility near a major commercial airport within the eastern United States that is suitable to support the staging, maintenance, and deployment of transportable NAS equipment.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. The preferred location is a property located at 7217 Cessna Drive. This site is gently sloped, requiring minimal excavation, and provides private and easy access for staging, storing and deploying FAA mobile assets. The site (approximately 190' x 470') is sufficiently sized to meet the MASA footprint and has adequate power, water, sewer, and fire hydrant connections in the vicinity. This alternative takes advantage of using a vacant site within a developed industrial park and limits tree removal and excavation activities in the area.

The proposed facility would be a rectangular, single-story building containing a six-bay storage area, and an office, locked storeroom, utility room, and bathroom. The building would be surrounded by paved areas to allow for vehicle access to the storage bays. Property access would be via existing roadways such as Cessna Drive and South Regional Road (State Route 1695). The proposed project will develop less than half of the parcel of land.

Five alternate sites near GSO were considered for the MASA. However, the sites were eliminated for reasons such as insufficient parcel size, lack of existing utility connections, poor site access, nearby residential properties, inappropriate zoning, or the presence of mature trees.

The No Action Alternative would be to not lease the subject property from Bessemer Improvement Company and not construct the 10,000-square foot storage facility. With the No Action Alternative, FAA would lack the capability to stage mobile NAS equipment in the eastern United States. Such an alternative would compromise the ability to provide rapid restoration of air traffic services during periods of extended equipment outages and would imperil continuity of NAS operations.

PARCEL DESCRIPTION AND VICINITY

The proposed MASA location is on a parcel of land near GSO owned by Bessemer Improvement Company at 7217 Cessna Drive, Greensboro, North Carolina 27409. The proposed location is south of Cessna Drive, within the city limits of Greensboro, approximately nine miles west of downtown and ½-mile southwest of GSO airport property boundary. The areas immediately surrounding the proposed location consist of industrial properties and roadways. Detailed images and maps of the area are provided in Figures 1, 2, 3, and 4.

The parcel of land (Parcel Number 98138), approximately 2.08 acres total, was historically used for agriculture. With the expansion and surrounding development of GSO, agricultural use declined over several decades. Based on a review of historical aerial photos, the parcel was completely covered with trees in 1993. Development of adjacent parcels and the removal of majority of trees on the parcel were completed by 1999. The parcel was never developed nor excavated. The parcel is currently vacant and zoned for heavy industrial use.

Figure 1: Facility and Vicinity Map

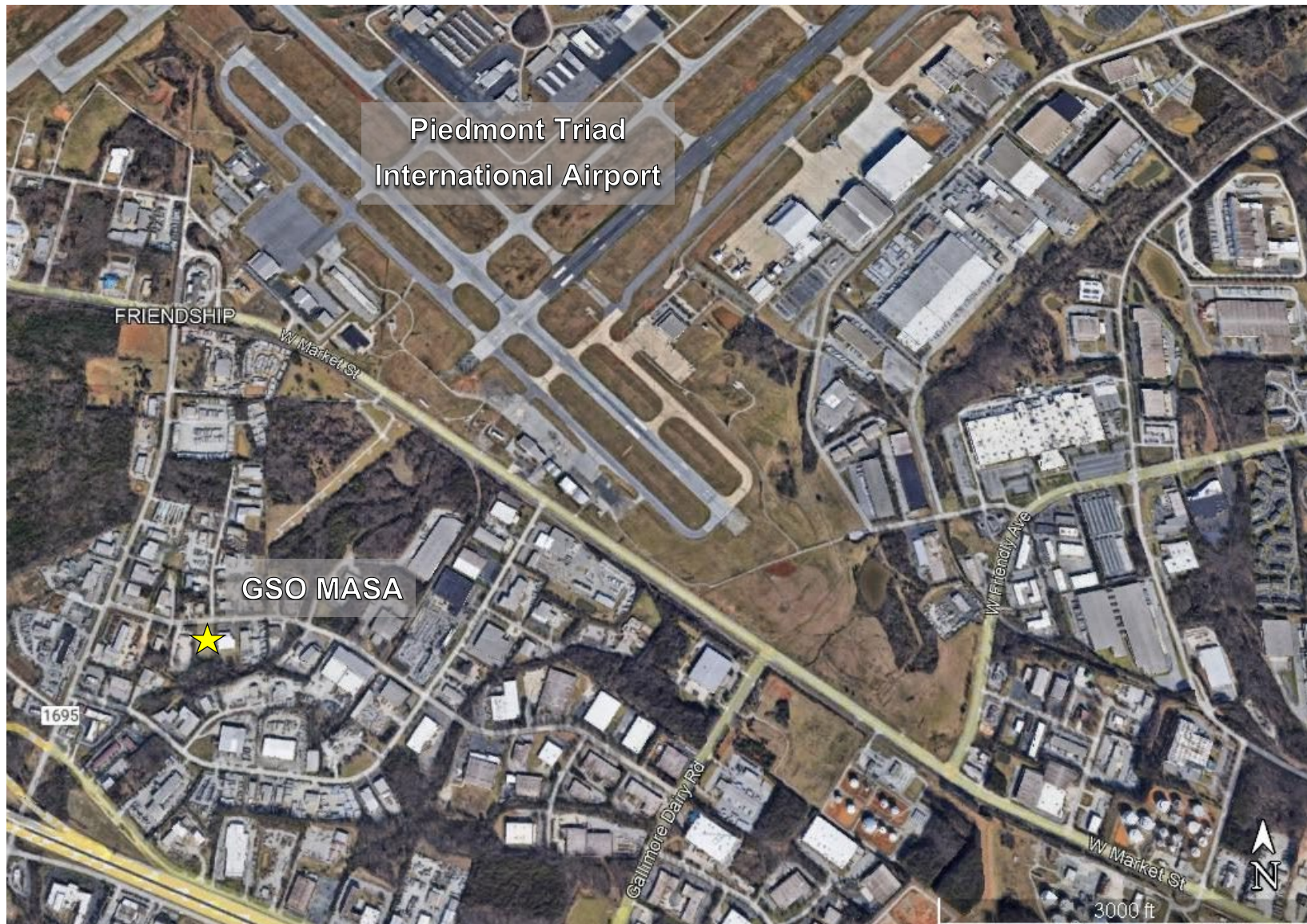


Figure 2: Site Area Map



Figure 3: Topographic Map

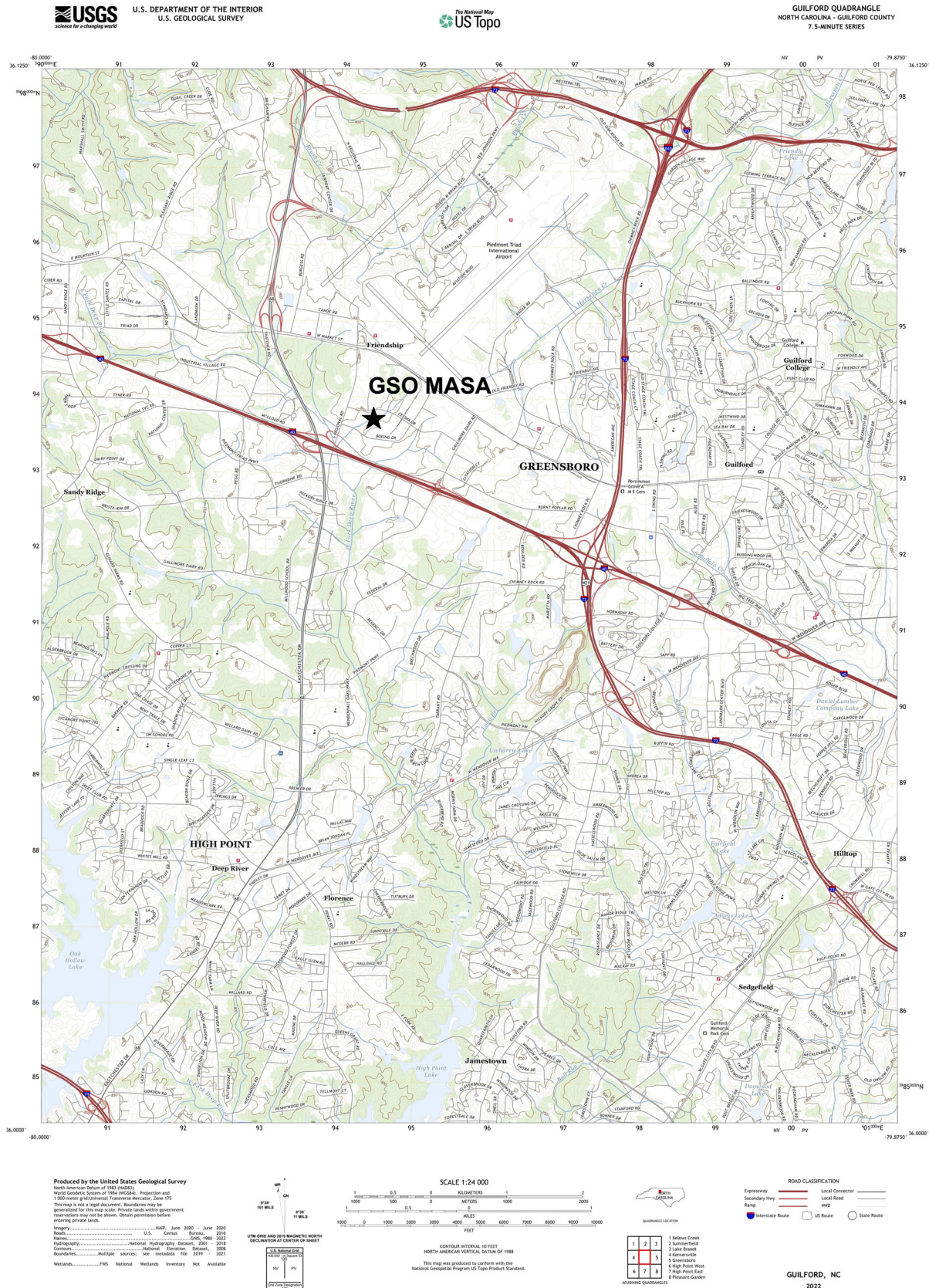


Figure 4: City of Greensboro Parcel Map




Parcel Number	98138	Total Out Building Value	0
PIN	7815805774	Total Land Value	239200
Owner	BESSEMER IMPROVEMENT CO	Total Deferred Value	0
Owner History	Card Image	Bldg Card	
Mail Address	PO BOX 14220	Appraisal Model Code	
Mail City	GREENSBORO	Deed Data	1/23/1997
Mail State	NC	Neighborhood	7825101
Mail Zip	27415	Property Type	IND
Property Address	7217 CESSNA DR	Structure Size	
Legal Description	24 PH B SEC 3 PB92-66 AIRPORT IN PK PL 92-66	Lot Size	2.08
Deed	004500-00176	Year Built	
Plat	92-66	Bedrooms	
Condo		Bathrooms	
Total Assessed	239200	Grade	
Total Building Value	0		



Disclaimer: While every effort is made to keep information current and accurate, the City of Greensboro does not warrant the accuracy or completeness of the information. No warranty, express or implied, is provided for the results and/or mapping data herein, or for their use or interpretation by the user.

Map Scale
1 inch = 100 feet
11/16/2022
2

Site Photographs, FAA GSO MASA Facility

1. Photo No.	1	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description View looking south from Cessna Drive. Shows the Subject Property which is vacant and located among developed properties in an industrial park. At the time of the site visit the property featured high grass and was difficult to access. A “No dumping” sign is shown at the front of the property as well as the property availability sign. The property was free of trash and nuisance dumping.			
			

Site Photographs, FAA GSO MASA Facility

1. Photo No.	2	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie

5. Location

7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)

6. Description

View looking southeast at the Subject Property standing in the northwest corner of the property. The full property is approximately 2.08 acres. The “Available” and “No Dumping” signs can be seen in this photo.



Site Photographs, FAA GSO MASA Facility

1. Photo No.	3	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie

5. Location


7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)

6. Description


View looking south from the intersection of Cessna Drive and Orville Wright Drive. The Subject Property is shown to the south, across Cessna Drive. Photo shows the storm water inlets with hatch access at the intersection.




Site Photographs, FAA GSO MASA Facility

1. Photo No.	4	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description Standing approximately 175 feet into the parcel at 7217 Cessna Drive looking south towards the southern wooded portion of the property. Photo shows the height of some of the overgrown vegetation at the time of the site visit. According to proposed site plans for the MASA facility, a 10,000 sq. feet building will be featured in this area.			
			

Site Photographs, FAA GSO MASA Facility

1. Photo No.	5	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description View looking north towards Cessna Drive from the edges of the wooded areas on the southern portion of the parcel. Neighboring property Excel Imaging Solutions building can be seen in the background across Cessna Drive. The line of trees on each side of the property is a good indication of approximate parcel boundaries. Quarles Fleet Fueling is located to the west and Precision Walls, Inc. is located to the east of this photo.			
			

Site Photographs, FAA GSO MASA Facility

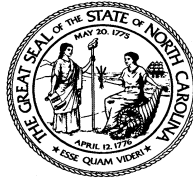
1. Photo No.	6	2. Facility	GSO MASA
3. Date	August 30, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description Standing off the property parcel near the northwest portion of the property along Cessna Drive looking west towards the Quarles Fleet Fueling location. Photo shows a street hydrant and a junction box on a concrete base, and slightly to the left of the junction box is an in-ground water meter.			
			

Site Photographs, FAA GSO MASA Facility

1. Photo No.	7	2. Facility	GSO MASA
3. Date	August 31, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description Standing on Cessna Drive looking southeast at the parcel. Photo shows the parcel after grass and field was cleared.			
			

Site Photographs, FAA GSO MASA Facility

1. Photo No.	8	2. Facility	GSO MASA
3. Date	August 31, 2022	4. Photographer	Stephen Ashtianie
5. Location 7217 Cessna Drive, Greensboro, North Carolina (36.083823 -79.952452)			
6. Description Standing in the northwest corner of the parcel looking south. Photo shows the parcel after grass and field was cleared.			
			



**North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary D. Reid Wilson

Office of Archives and History
Deputy Secretary, Darin J. Waters, Ph.D.

January 19, 2023

Jeff Furr
Federal Aviation Administration
400 Virginia Avenue SW, Suite 500
Washington, DC 20024

jeff.ctr.furr@faa.gov

Re: Construct Mobile Asset Staging Area, Piedmont Triad International Airport, Greensboro,
Guilford County, ER 18-2687

Dear Mr. Furr:

Thank you for your letter of December 7, 2022, concerning the above-referenced undertaking. We have reviewed the submittal and offer the following comments.

We have conducted a review of the project and are aware of no historic resources which would be affected by the project. Therefore, we have no comment on the project as proposed.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

A handwritten signature in blue ink that reads "Renee Gledhill-Earley".

for Ramona Bartos, Deputy
State Historic Preservation Officer

APPENDIX B-3. TRIBAL CONSULTATION



U.S. Department
of Transportation
**Federal Aviation
Administration**

December 7, 2022

The Honorable William Harris, Chief
Catawba Nation
996 Avenue of the Nations
Rock Hill, SC 29730

Subject: Request to Initiate Government to Government Consultation, FAA GSO MASA Project, Guilford County, North Carolina

Dear Chief Harris:

The Federal Aviation Administration (FAA) would like to initiate consultation with you on the FAA's proposed 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. This letter initiates government-to-government consultation with you in accordance with Executive Order 13175, *Consultation and Coordination with Indian and Tribal Governments*, and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*. The primary purpose of government-to-government consultation as described by these Orders is to ensure that federally-recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Tribes. This request for consultation is also made pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations, 36 CFR Part 800, as amended.

The FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport. The FAA has determined that this project and its associated activities are subject to Section 106 of the NHPA and to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to meet its regulatory obligations; Section 106 requirements will be completed in conjunction with the NEPA process. A full description of the proposed action and its location is included in the attached *Summary of Proposed Action and Alternatives*.

The FAA has identified your tribe as potentially having an interest in the project. Pursuant to 36 CFR §800.2(c)(2)(B)(ii) and the Executive and FAA Orders referred to above, the FAA is seeking input on properties of cultural and/or religious significance that may be affected by this project. We would like to know about your Tribe's interest to consult with us regarding the broader range of impacts assessed under NEPA, including those to tribal lands and resources. The FAA is not requesting that your Tribe conduct research that goes beyond that which we are currently undertaking. Therefore, please be aware that the FAA

would be unable to pay any research fees. If you have any readily available information that you wish to share, please do so.

If you have any questions or feedback concerning the project, or require any additional information, please feel free to contact Mr. Ankit Patel, Mobile Asset Sustainment Program Lead, AJW-2443, via mail (FAA National Headquarters, 800 Independence Ave SW, Orville Wright Bldg. (FOB 10A), Washington, DC 20591), email (ankit.patel@faa.gov), or phone at (202) 267-6095. In addition, you may contact our designated non-Federal representative, Mr. Jeff Furr, EOSH Professional, via email (jeff.ctr.furr@faa.gov) or phone at (202) 460-0587. Please contact us within 30 calendar days of the receipt of this letter to confirm your intent to participate in this Section 106 consultation.

Sincerely,

ANKIT P PATEL  Digitally signed by ANKIT P PATEL
Date: 2022.12.07 08:26:29 -05'00'

Ankit Patel
Mobile Asset Sustainment Program Lead

Enclosure:

GSO MASA; Summary of Proposed Action and Alternatives

cc: Dr. Wenonah G. Haire, Tribal Historic Preservation Officer, Catawba Nation
Caitlin Rogers, Tribal Historic Preservation Officer Assistant



U.S. Department
of Transportation
**Federal Aviation
Administration**

December 7, 2022

The Honorable Richard Sneed, Principal Chief
Eastern Band of Cherokee Indians
P.O. Box 1927
Cherokee, NC 28719

Subject: Request to Initiate Government to Government Consultation, FAA GSO MASA Project, Guilford County, North Carolina

Dear Chief Sneed:

The Federal Aviation Administration (FAA) would like to initiate consultation with you on the FAA's proposed 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. This letter initiates government-to-government consultation with you in accordance with Executive Order 13175, *Consultation and Coordination with Indian and Tribal Governments*, and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*. The primary purpose of government-to-government consultation as described by these Orders is to ensure that federally-recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Tribes. This request for consultation is also made pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations, 36 CFR Part 800, as amended.

The FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport. The FAA has determined that this project and its associated activities are subject to Section 106 of the NHPA and to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to meet its regulatory obligations; Section 106 requirements will be completed in conjunction with the NEPA process. A full description of the proposed action and its location is included in the attached *Summary of Proposed Action and Alternatives*.

The FAA has identified your tribe as potentially having an interest in the project. Pursuant to 36 CFR §800.2(c)(2)(B)(ii) and the Executive and FAA Orders referred to above, the FAA is seeking input on properties of cultural and/or religious significance that may be affected by this project. We would like to know about your Tribe's interest to consult with us regarding the broader range of impacts assessed under NEPA, including those to tribal lands and resources. The FAA is not requesting that your Tribe conduct research that goes beyond that which we are currently undertaking. Therefore, please be aware that the FAA

would be unable to pay any research fees. If you have any readily available information that you wish to share, please do so.

If you have any questions or feedback concerning the project, or require any additional information, please feel free to contact Mr. Ankit Patel, Mobile Asset Sustainment Program Lead, AJW-2443, via mail (FAA National Headquarters, 800 Independence Ave SW, Orville Wright Bldg. (FOB 10A), Washington, DC 20591), email (ankit.patel@faa.gov), or phone at (202) 267-6095. In addition, you may contact our designated non-Federal representative, Mr. Jeff Furr, EOSH Professional, via email (jeff.ctr.furr@faa.gov) or phone at (202) 460-0587. Please contact us within 30 calendar days of the receipt of this letter to confirm your intent to participate in this Section 106 consultation.

Sincerely,

ANKIT P PATEL  Digitally signed by ANKIT P PATEL
Date: 2022.12.07 08:28:55 -05'00'

Ankit Patel
Mobile Asset Sustainment Program Lead

Enclosure:

GSO MASA; Summary of Proposed Action and Alternatives

cc: Russell Townsend, Tribal Historic Preservation Officer



U.S. Department
of Transportation
**Federal Aviation
Administration**

December 7, 2022

The Honorable David Hill, Principal Chief
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

Subject: Request to Initiate Government to Government Consultation, FAA GSO MASA Project, Guilford County, North Carolina

Dear Chief Hill:

The Federal Aviation Administration (FAA) would like to initiate consultation with you on the FAA's proposed 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. This letter initiates government-to-government consultation with you in accordance with Executive Order 13175, *Consultation and Coordination with Indian and Tribal Governments*, and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*. The primary purpose of government-to-government consultation as described by these Orders is to ensure that federally-recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Tribes. This request for consultation is also made pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations, 36 CFR Part 800, as amended.

The FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport. The FAA has determined that this project and its associated activities are subject to Section 106 of the NHPA and to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to meet its regulatory obligations; Section 106 requirements will be completed in conjunction with the NEPA process. A full description of the proposed action and its location is included in the attached *Summary of Proposed Action and Alternatives*.

The FAA has identified your tribe as potentially having an interest in the project. Pursuant to 36 CFR §800.2(c)(2)(B)(ii) and the Executive and FAA Orders referred to above, the FAA is seeking input on properties of cultural and/or religious significance that may be affected by this project. We would like to know about your Tribe's interest to consult with us regarding the broader range of impacts assessed under NEPA, including those to tribal lands and resources. The FAA is not requesting that your Tribe conduct research that goes beyond that which we are currently undertaking. Therefore, please be aware that the FAA

would be unable to pay any research fees. If you have any readily available information that you wish to share, please do so.

If you have any questions or feedback concerning the project, or require any additional information, please feel free to contact Mr. Ankit Patel, Mobile Asset Sustainment Program Lead, AJW-2443, via mail (FAA National Headquarters, 800 Independence Ave SW, Orville Wright Bldg. (FOB 10A), Washington, DC 20591), email (ankit.patel@faa.gov), or phone at (202) 267-6095. In addition, you may contact our designated non-Federal representative, Mr. Jeff Furr, EOSH Professional, via email (jeff.ctr.furr@faa.gov) or phone at (202) 460-0587. Please contact us within 30 calendar days of the receipt of this letter to confirm your intent to participate in this Section 106 consultation.

Sincerely,

ANKIT P PATEL  Digitally signed by ANKIT P PATEL
Date: 2022.12.07 08:25:14 -05'00'

Ankit Patel
Mobile Asset Sustainment Program Lead

Enclosure:

GSO MASA; Summary of Proposed Action and Alternatives

cc: Ms. LeeAnne Wendt, Tribal Archaeologist, Muscogee (Creek) Nation

From: [LeeAnne Wendt](#)
To: [Furr, Jeff CTR \(FAA\)](#)
Cc: [Patel, Ankit \(FAA\)](#); [Fritz, Molly D-CTR \(FAA\)](#)
Subject: Re: FAA GSO MASA Project in Greensboro, North Carolina - consultation with Muscogee (Creek) Nation
Date: Monday, January 9, 2023 12:19:49 PM

Jeff,

Thank you for contacting the Muscogee (Creek) Nation concerning the Proposed Construction of a Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. The proposed project area is located within our historic area of interest and continues to hold importance to us. After reading the information provided, it was noted that the FAA proposed an approximately 10,000-square foot MASA at 7217 Cessna Drive and that FAA will develop less than half of the parcel of land (2.08 acres total). The Muscogee (Creek) Nation believes that there should be *no effects to any known historic properties*. However, due to the historic presence of our people within the project area, if any inadvertent discoveries of cultural material (i.e. artifacts) and/or human remains and/or funerary objects are noted during any required work that includes ground disturbance, we request to be notified as soon as the discovery is made and that appropriate federal agencies are also notified. Additionally, if there are any updates or changes to the proposed project (e.g. change of location/property), we request that the information be sent to our office for further review. If you have any questions regarding this, please do not hesitate to contact me.

Regards,
LeeAnne Wendt

LeeAnne Wendt, M.A., RPA
Tribal Archaeologist, Historic and Cultural Preservation Department
The Muscogee Nation
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From: Furr, Jeff CTR (FAA) <Jeff.CTR.Furr@faa.gov>
Sent: Wednesday, December 7, 2022 4:03 PM
To: David Hill <dhill@muscogeenation.com>; LeeAnne Wendt <lwendt@muscogeenation.com>; Section106 <section106@muscogeenation.com>
Cc: Patel, Ankit (FAA) <Ankit.Patel@faa.gov>; Fritz, Molly D-CTR (FAA) <Molly.D-CTR.Fritz@faa.gov>
Subject: FAA GSO MASA Project in Greensboro, North Carolina - consultation with Muscogee (Creek) Nation

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Dear Chief Hill –

On behalf of the Federal Aviation Administration (FAA), we would like to initiate consultation with you about a proposed project in Greensboro, North Carolina. Please see the attachments for further information.

Thank you for your assistance, and please contact us with any questions.

Regards,
Jeff

Jeff Furr
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U.S. Department
of Transportation
**Federal Aviation
Administration**

December 7, 2022

The Honorable Tom Jonathan, Chief
Tuscarora Nation
5226 Walmore Road
Lewistown, NY 14092

Subject: Request to Initiate Government to Government Consultation, FAA GSO MASA Project, Guilford County, North Carolina

Dear Chief Jonathan:

The Federal Aviation Administration (FAA) would like to initiate consultation with you on the FAA's proposed 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport (GSO) in Greensboro, Guilford County, North Carolina. This letter initiates government-to-government consultation with you in accordance with Executive Order 13175, *Consultation and Coordination with Indian and Tribal Governments*, and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*. The primary purpose of government-to-government consultation as described by these Orders is to ensure that federally-recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Tribes. This request for consultation is also made pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations, 36 CFR Part 800, as amended.

The FAA's proposed action is to construct an approximately 10,000-square foot Mobile Asset Staging Area (MASA) near the Piedmont Triad International Airport. The FAA has determined that this project and its associated activities are subject to Section 106 of the NHPA and to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to meet its regulatory obligations; Section 106 requirements will be completed in conjunction with the NEPA process. A full description of the proposed action and its location is included in the attached *Summary of Proposed Action and Alternatives*.

The FAA has identified your tribe as potentially having an interest in the project. Pursuant to 36 CFR §800.2(c)(2)(B)(ii) and the Executive and FAA Orders referred to above, the FAA is seeking input on properties of cultural and/or religious significance that may be affected by this project. We would like to know about your Tribe's interest to consult with us regarding the broader range of impacts assessed under NEPA, including those to tribal lands and resources. The FAA is not requesting that your Tribe conduct research that goes beyond that which we are currently undertaking. Therefore, please be aware that the FAA

would be unable to pay any research fees. If you have any readily available information that you wish to share, please do so.

If you have any questions or feedback concerning the project, or require any additional information, please feel free to contact Mr. Ankit Patel, Mobile Asset Sustainment Program Lead, AJW-2443, via mail (FAA National Headquarters, 800 Independence Ave SW, Orville Wright Bldg. (FOB 10A), Washington, DC 20591), email (ankit.patel@faa.gov), or phone at (202) 267-6095. In addition, you may contact our designated non-Federal representative, Mr. Jeff Furr, EOSH Professional, via email (jeff.ctr.furr@faa.gov) or phone at (202) 460-0587. Please contact us within 30 calendar days of the receipt of this letter to confirm your intent to participate in this Section 106 consultation.

Sincerely,

ANKIT P PATEL Digitally signed by ANKIT P PATEL
Date: 2022.12.07 08:27:53 -05'00'

Ankit Patel
Mobile Asset Sustainment Program Lead

Enclosure:

GSO MASA; Summary of Proposed Action and Alternatives