U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

ALASKA REGION

FINDING OF NO SIGNIFICANT IMPACT/ RECORD OF DECISION

South Airpark Cargo Improvements

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GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT IS IN THIS DOCUMENT? This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI)/Record of Decision (ROD) (FONSI/ROD) for the proposed South Airpark Cargo Improvements project, located in Anchorage, Alaska. This document includes the agency determinations and approvals for the proposed Federal actions described in the Final Environmental Assessment dated August 2023. This document discusses alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Action and No Action alternatives. This document also identifies applicable and required mitigation.

U.S. DEPARTMENT OF TRANSPORTATION

FEDERAL AVIATION ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION

SOUTH AIRPARK CARGO IMPROVEMENTS,
ANCHORAGE, ALASKA

1. INTRODUCTION

This document is a Finding of No Significant Impact (FONSI)/Record of Decision (ROD) (FONSI/ROD) of the proposed South Airpark Cargo Improvements project at the Ted Stevens Anchorage International Airport (ANC) in Anchorage, Alaska. This document includes the agency determinations and approvals for the proposed Federal actions described in the Final Environmental Assessment dated August 2023. The Alaska Department of Transportation & Public Facilities (DOT&PF) is the sponsor for ANC. The Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) before being able to take the proposed federal actions. The federal action taken by the FAA is an approval of the proposed improvements in an ANC Airport Layout Plan (ALP) amendment.

2. PURPOSE AND NEED OF THE PROPOSED ACTION

The purpose of the proposed privately-funded project is to develop infrastructure to efficiently support air cargo operations at ANC at the South Airpark lot leased to NorthLink Aviation (ADA- 32351). The portion of South Airpark leased to NorthLink was designated for development in the ANC 2014 Master Plan Update. NorthLink's lease with the State of Alaska states the authorized use of land is: "Development, construction, operation, and maintenance of an air cargo storage and transfer facility." NorthLink Aviation proposes to develop cargo facilities to support the growing air cargo industry at ANC.

Global Efficiency Need: The demand for Transpacific air freight has increased at a much faster rate than ocean transport capacity, and shippers are increasingly moving into air freight to meet supply chain needs. According to 2022 data from the Airports Council International, the aggregate tonnage among the world's top 10 busiest cargo airports increased 15 percent year- over-year, and ANC 2021 cargo was up 12.6 percent versus 2020 and nearly 30 percent versus 2019 to more than 3.5 million tons of cargo. The Anchorage Economic Development Corporation (AEDC) is projecting eight percent growth through 2023, and annual tonnage increases in the two percent range each year thereafter.

State of Alaska Economic Need: Sustainable economic growth is a goal of the State of Alaska. Introducing new cargo facilities, such as hardstands and warehouses, will not only meet the immediate demand described above, but will also support and encourage projected long- term growth by supporting ANC's transition from being a fuel stop and crew-change site, to an all-purpose site where cargo carriers can efficiently download and upload cargo, including temporarily storing cargo in a warehouse. The

improvement in cargo facilities is expected to make ANC more competitive and make Alaska a more desirable world-wide cargo hub.

Additional cargo facilities would create long-term economic growth in Alaska by creating permanent job opportunities. ANC presently supplies one in seven jobs in Anchorage and generates $1.84 billion in economic benefit.

ANC Cargo Facility Deficiencies: As Transpacific air cargo volumes have grown, ANC has become a leading air cargo airport, creating a need for additional infrastructure to park and service planes and move cargo. ANC is situated in a unique location—9.5 hours from 90% of the industrialized world. Therefore, one may reasonably assume continued or increasing overall traffic. Planes transiting ANC need available hardstands to park and that have access to hydrant fueling and ground service providers. As stated above, the cargo industry is a growing sector of ANC and airport cargo infrastructure is anticipated to decrease in capacity on the horizon. As of December 2022, ANC administers 14 remote hardstands that can accommodate wide-body aircraft, primarily used for commercial cargo aircraft. ANC also has nine wide-body passenger gates (N1-8, B3) at the two passenger terminals that are used on a secondary priority or contingency basis for cargo aircraft parking. In addition, a private terminal owned by UPS has six hardstands that can accommodate freighters. The hardstand infrastructure is forecast to decrease by up to 14 available hardstands due to expected expansions (UPS hardstands no longer being available for third party lease) and the growth of international passenger traffic (which would remove ANC's North Passenger Terminal as an option for cargo freighter parking). ANC does not have enough cargo facilities to meet either expected or desired growth to fulfill the Global Efficiency need or the State of Alaska Economic growth need.

3. PROPOSED ACTION

The Proposed Action would include the following components:

- New aircraft parking apron
- Connector taxilane(s) to Taxiway Romeo and future Taxiway Zulu extension
- Blast fence(s)
- Cargo terminal
- Fueling and glycol distribution/recovery facilities
- Ground service equipment/unit load device facility
- Ground service equipment and vehicular parking areas
- Road connection to South Airpark Place
- Retention basin and/or snow storage area
- New security and perimeter fencing
- Earth berm

The new aircraft parking apron will include an 80-acre paved surface with 15 hardstands equipped with in-ground fuel hydrants (supplied by transportation pipelines) and in-ground power connections. These new 15 hardstands would replace various hardstands that are expected to become unavailable.

Taxilanes connect the aircraft parking apron to the north/south Taxiway Zulu and the proposed future east/west Taxiway Zulu expansion. A 90,000 square-foot warehouse and parking lot would be located in the southeast corner of the lease lot and would provide office facilities and serve as a terminal for cargo

storage. The ground service equipment and unit load device facility (and associated outdoor parking) would be located along the southern portion of the paved surface, in addition to storage for diesel fuel.

The project will include a first-in-Alaska glycol recovery and recycling system in a structure directly adjacent/connected to the ground service equipment facility. The glycol recycling facility will include indoor storage of glycol and water used for deicing aircraft, as well as glycol concentrators for recycling.

A 25-foot-tall earth berm will be constructed and topped with approximately 15-foot-tall wooded vegetation on the southern edge of the proposed development. Blast fences would be placed strategically to redirect the exhaust from jet engines. A retention basin will provide a location for stormwater to be collected from the new impervious surface (e.g., hardstands, taxilanes, aprons) and settle potential contaminants. The retention basin is drainage infrastructure that maintains a pool of water long term. Stormwater will otherwise drain to the ANC stormwater system. New security measures and perimeter fencing will be placed in accordance with ANC standards. An access road would be constructed to route vehicular traffic from South Airpark Place to the NorthLink Lease Lot. Additional work may include vegetation clearing, drainage improvements, signing and striping, lighting, and adjusting utilities as needed.

Support activities would include staging, stockpiling, material sourcing, and potentially minor disposal of unusable excavation. Staging and stockpiling will occur on the lease lot in areas designated for development. Material would be sourced from local permitted sites and trucked in using existing roads. No improvements to roads would be necessary to truck in fill. Excavated materials from the project area will be re-used in construction to the greatest extent possible. Material unusable for construction of the cargo infrastructure will be used to build the earthen berm.

4. REQUESTED FEDERAL ACTION

The Federal Action requested of the FAA is to approve the ALP amendments for apron and taxi lanes to provide connections required for NorthLink's cargo development leasehold. There are no proposed modifications to FAA Design Standards included in this project.

5. REASONABLE ALTERNATIVES

Proposed Action

The Proposed Action (or project) alternative would amend the ALP and develop the NorthLink Lease Lot for cargo infrastructure in recognition of the forecast loss of infrastructure in a different part of ANC. The Proposed Action alternative would develop a cargo parking apron, hardstands, and a warehouse building to park cargo aircraft and store cargo. Cargo operations are unlikely to decrease and, more likely, cargo infrastructure at ANC will be in high demand. The Proposed Action minimizes environmental impacts to the greatest extent practicable while addressing identified issues as stated in the project purpose and need.

No Action

Under the No-Action alternative, there would be no amendment to the ALP and no improvements constructed at the NorthLink Lease Lot and the lot would remain unutilized airport property. ANC would remain over-capacity for cargo resources and the cargo infrastructure need would remain unmet. Furthermore, inefficiencies may increase in the future due to the forecasted increase in cargo operations at ANC, or demand for ANC as a cargo hub may diminish due to the lack of cargo infrastructure. In addition, and as noted above, up to 14 hardstands are expected to become unavailable.

NorthLink as the leaseholder proposes to develop its lease lot. It does not have authority to develop outside its lease lot. Nevertheless, various other alternatives were considered including (1) South Airpark Siting the Facility to the West; (2) West Airpark; (3) North Airpark; (4) Hard Stands Throughout ANC at Various Locations.

The totality of the circumstances presented, and consideration of other alternatives that were considered but not advanced, supports the reasonable alternative analysis presented in Section 2.0 of the Final Environmental Assessment (Final EA).

6. ASSESSMENT OF ENVIRONMENTAL IMPACTS

Section 3 and Table 2 of the Final EA contain an environmental impact analysis, which discloses the project's potential impacts to resource categories defined in FAA Order 1050.1F. The Proposed Action would result in no significant impacts to any of the FAA-defined resource categories, including those resources that are protected under special purposes laws and requirements such as Executive Order 11988, *Floodplain Management*; Executive Order 11990, *Protection of Wetlands*; Section 7 of the Endangered Species Act; or Section 106 of the National Historic Preservation Act.

Section 4(f)

The Proposed Action will not permanently incorporate land from a 4(f) protected property, nor will the Proposed Action temporarily use land from a 4(f) protected property.

A significant noise impact, as defined by the FAA (see Noise and Noise Compatible Land Use discussion below), to Kincaid Park will not occur. As depicted in the noise contours found in Appendix A to the noise study, the area north of Little Campbell Lake is predicted to be within the 65 and 70 dB DNL for the 2020 ANC Predicted DNL Noise Contour Map. The reason for this exposure to existing Airport noise derives from the proximity of Kincaid Park to airport operations. Figure 5 of the Final EA depicts ANC's east/west runway just to the north of Kincaid Park, for example. The Proposed Action, meanwhile, will produce noise anticipated to be at or below 54 DNL. Kincaid Park already encounters noise impacts from ANC but still continues to be one of the most popular parks in Anchorage. The Proposed Action will not substantially impair the activities within the park and there will subsequently be no constructive use of a 4(f) property due to noise impacts.

The Proposed Action will clear vegetation in the vicinity of Kincaid Park and build cargo facilities. The tallest structures of the Proposed Action are a 50- to 60-foot cargo terminal facility and 60-foot-tall lighting poles (all on finished grade of approximately 120 feet elevation). Trails located on the eastern side of the park will have a vegetative buffer and the highest elevation point within these trails is approximately 236 feet in elevation. Clearing required for the Proposed Action will occur nearly one-quarter mile to the east of Kincaid Park, and further still from the nearest trail. Line of sight from the highest elevation points of the closest trail to the project area was evaluated and is described in detail in Section 3.6 Visual Resources / Visual Character.

Line of sight from the trails is not possible due to the vegetation; no visual impacts are anticipated, accordingly there is no constructive use due to visual impacts.

Temporary noise impacts may result from the operation of heavy equipment, the presence of construction crews, and other associated construction activities. Abatement methods such as proper maintenance of construction equipment would help reduce these impacts. Construction of the Proposed Action will not impede access to 4(f) resources.

Hazardous Materials, Solid Waste, and Pollution Prevention

The Proposed Action is located adjacent to areas of documented soil contamination, related to Hazard ID 414, AIA Fire Training Pit. Ground disturbing activities, including vegetation clearing, excavation, and earthwork, would be required for the construction of the Proposed Action.

A concern raised in relationship to this project is PFAS contamination. PFAS has been found in the surface materials[1] of the Project Area but is below Alaska Department of Environmental Conservation (ADEC)

[1] Appendix H, Agency Scoping, states that "[t]wo PFAS studies have been conducted and PFAS is non- detect in the project area." However, ADEC clarified in April 2022 that it was detect in the surface (but below action levels), and non-detect in subsurface soils. Concentrations of PFAS/PFOA were not detected in exceedance of ADEC cleanup criteria.

cleanup levels[2]. Although known PFAS exists in the AIA Fire Training Pit located near the northwest corner of the project area, the northwest corner of the project area is proposed for fill, not excavation. Therefore, no movement of soils is expected in the immediate vicinity of the AIA Fire Training Pit. Because PFAS testing results showed only levels below cleanup guidelines, and because no excavation work will be required in the vicinity of AIA Fire Training Pit, the Proposed Action is not expected to encounter any contamination during construction activities.

On March 31, 2022, ADEC confirmed that no further action is needed unless excavation is proposed in the northwest corner of the project (see Appendix H for documentation).

On June 24, 2022, ADEC sought additional time to further test soils in the area for PFAS and conduct PFAS testing in wells of Sand Lake residents to the south of the ANC.

In November, 2022, ADEC entered an agreement with engineering firm Shannon & Wilson to conduct additional sampling, primarily at the fire training area. It did so via an ADEC approved work plan[3]. (Appendix H.)

After conducting additional sampling, ADEC provided an update by letter dated February 23, 2023. ADEC characterized their sampling effort as being in direct response to surrounding community concerns for the "safety and potential impacts to their drinking water." Importantly, test results did not indicate the presence of PFAS or PFOA at action levels[4].

In response to further inquiry by the Sponsor, on April 11, 2023, ADEC confirmed that environmental testing of soils and groundwater will continue, but that "results are not anticipated to impact the planned construction." ADEC explained that while it is indeed doing additional sampling of soil and groundwater, the project area "was previously sampled by Chemtrack which found PFAS did not exceed ADEC cleanup levels in soil to a depth expected to be encountered during construction." That fact—construction not being at a depth anticipated for construction—is set forth in the Final EA at 3.7.2.2, Groundwater. Therein it describes that excavation is anticipated to reach a maximum of 25 feet below finished grade whereas the groundwater depth is at or around 42 feet.

If, based upon the testing contemplated in the approved work plan, contamination is found at actionable levels, then ADEC indicated in its February 23, 2023, letter that site clean-up obligations would be triggered. However, and as noted above, despite a variety of testing in multiple locations, actionable levels of PFAS/PFOA have not been found on the project site or in the neighboring community's groundwater.

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[2] Appendix H, ADEC comments, April 11, 2023.

[3] As described in the Shannon & Wilson work plan, sampling "will primarily support an informed evaluation of the extent of the PFAS contamination at and near the ANC fire training area." Figure 2 in the November 2022 work plan depicts various test sites both within and outside of the Project Area.

[4] ADEC made a similar comment on April 11, 2023, as follows:

> The Anchorage International Airport (AIA) sampled drinking water wells around the airport, including in the neighborhood south of Raspberry Road. Per- and polyfluroroalkyl substances (PFAS) were detected in a small number of wells in the area, all below ADEC action levels.

If contaminated materials are identified during construction (such as based upon analysis of ADEC sampling that has occurred or that might occur in the future), a contaminated materials management plan, approved by DEC, would be required. Well testing results may be accessed by contacting either the FAA or the ANC contacts listed on the cover page of this Final EA. Documentation of coordination with ADEC can be found in Appendix H.

Additionally, PFAS impacts to groundwater are not expected because the Proposed Action will not be moving contaminated soil and groundwater will not be contacted as a result of project construction (see Section 3.7 of the Final EA for additional discussion). Post-construction conditions will include an impervious surface (hardstands, taxilanes, aprons) that will stop water from percolating through the soil into groundwater.

Due to the largely undeveloped nature of the project area, the Proposed Action would generate minimal construction waste. Hazardous materials used during construction would be limited to minor amounts of fuel, lubricants, hydraulic fluids, cleaning solvents, and paint. Any construction waste generated would be disposed of at the local landfill in accordance with state and federal laws and regulations. Stormwater discharges during construction would adhere to a Storm Water Pollution Prevention Plan (SWPPP) required under a Construction General Permit. Stormwater during facility operations will drain into the ANC stormwater system.

Over time, the Proposed Action may result in incidental and minor releases of hazardous materials within the project area due to the storage, transport, and refueling of glycol, diesel exhaust fluid, and diesel. Depending on the quantity of hazardous materials, a spill prevention, control, and countermeasure plan may be required and implemented per 40 CFR 112 and ADEC spill prevention and response regulations outlined in 18 AAC 75. In addition, the project will be required to comply with the hazardous materials, storage, and spill directives of the ANC Lease (ADA 32351), ANC Operations Manual, and all applicable airport regulations.

One of the primary activities that contribute to water pollution at airports around the country is the use of glycol-based aircraft deicing fluids. Glycol mixed in a stormwater discharge has the potential to migrate to receiving waters and reduce available oxygen to aquatic life. There is no current plan to avoid the use of glycol, however the project will construct a glycol recovery and recycling facility to prevent glycol impacts to water quality; the first such facility at ANC. The glycol recycling process includes catching glycol mixed with snow, rain, or ice in a separate storm drain system which drains into a cistern. The water/glycol mix is pumped from the cistern into glycol concentrators which use heat to separate water and glycol. The remaining glycol, now distilled, goes into a finishing unit to bring the used glycol up to FAA standard for re-use.

Overall, impacts to water quality resulting from glycol use at ANC will decrease due to the glycol recovery and recycling system.

Historical, Architectural, Archaeological, and Cultural Resources

The Proposed Action is unlikely to impact any significant historical, architectural, archaeological, or cultural resources. No such resources have been documented within or adjacent to the Area of Potential Effect (APE). Portions of the project area are previously disturbed. Moreover, the project area does not exhibit features such as lookout points, fish streams, or good tool stone that would increase the likelihood of

encountering buried archaeological resources. The APE, therefore, has low probability for undiscovered cultural resources.

Although not within the APE, the Nike Point Site is near the project area. Indirect impacts were considered for the Nike Point Site and dismissed because there will be no visual, auditory, or other impacts that may compromise the character or attributes for which the Nike Point Site is eligible for listing on the NRHP. Visual impacts are not expected because the Proposed Action will not be visible from the Nike Point Site (i.e., Kincaid Park) as discussed in Section 3.6 Visual Resources / Visual Character. Noise impacts are not expected to the Nike Point Site, because project noise will not exceed current noise conditions and impacts from ANC.

The FCC Secondary Monitoring Station was given two AHRS site numbers; one for the antenna array (TYO-00373) and one for the buildings (TYO-00374). A determination of eligibility for listing on the NRHP was conducted for both sites of the Anchorage FCC Secondary Monitoring Station (TYO-00373 and TYO-00374). The eligibility determinations found the antenna array (TYO-00373) to be not eligible for listing on the NRHP and the buildings (TYO-00374) to be possible eligible, pending further data collection. Because the buildings are not located within the project area and no direct impacts would be expected, a finding of *No Historic Properties Affected* was recommended for the Proposed Action.

A Findings Letter was sent to the State Historic Preservation Office (SHPO) on May 6, 2022, requesting a finding of *No Historic Properties Affected*. The SHPO responded with a concurrence letter agreeing to a finding of *No Historic Properties Affected* on May 12, 2022. Appendix C shows Section 106 documentation.

Noise and Noise Compatible Land Use

The Proposed Action will not impact the airport forecast. The No Action and With Project forecast are the same.

The FAA approved "Environmental Noise Impact Study" (Appendix D) conducted for the Proposed Action found operation of the facility, including taxiing of multiple aircraft simultaneously, will not result in significant noise impacts. The predicted DNL from the new Airpark operations only (21 planes completing 42 trips) is 53 dBA when assuming planes taxi for 10 minutes at the Airpark and immediate vicinity.

The noise analysis generated comments during the public comment period and during the public meeting held on Tuesday, May 30, 2023. Public comment was focused on alleged errors in the noise analysis, not on the exact type or form of noise modeling used. Most comments alleged that noise impacts were greatly underestimated for a variety of reasons,[5] but not that a different type of noise analysis model should be used.

There were no comments received particular to the noise contours derived from the 2015 Part 150 noise study and appended to the noise study as Appendix A (2020 projected contours) and Appendix B (2015

[5] Comments raised concerns that noise was underestimated. Concerns included that there was an inadequate buffer zone, an inadequate berm, an inadequate forecast of noise in general, a failure to consider future noise levels and, inadequate protections for Kincaid Park. There were also one or more requests for redesign to minimize "noise pollution."

contours). The 2015 Part 150 noise study depicts the Airpark area as falling between the 60 and 65 contour sound levels. That noise study included a "2020 ANC Predicted DNL Noise Contour Map" attached as Appendices A and B thereto. Since 2020, the number of overall aircraft operations has increased.[6] The aircraft operations would increase in the future at the annual average growth rate of approximately 1.6%.[7]

The 2020 ANC Predicted DNL Noise Contour Map suggests that the background airport noise exceeds the noise the neighborhood might experience from taxiing of large aircraft at the Airpark area. Although we note this information, and have considered it, the FAA-approved noise analysis also relies on prediction of the Proposed Action noise contribution and based on that noise contribution alone, we would find no significant impact.

Because of the number of comments received particular to noise, after the May 30, 2023 public meeting the FAA's Office of Environment and Energy, Noise Division (AEE-100), undertook review of the noise analysis and requested additional information from NorthLink. During the review process, the FAA requested that NorthLink submit underlying mathematical assumptions for its noise calculations and NorthLink corrected for a topography error in its original calculations. Making those adjustments, the dBA level decreased by 4 from 57 dBA to 53 dBA. The 53 DNL includes consideration of a 25-foot earthen berm to be constructed by NorthLink. The FAA approved NorthLink's noise analysis as modified—per the above--on July 19, 2023. (Appendix D.)

NorthLink added a section to its noise analysis intended as a supplemental check on the 53 dBA result. Specifically, NorthLink used a DataKustik CadnaA software program that can predict noise impacts after considering factors such as topography, foliage and other common environmental noise impact variables. The results assuming the most conservative estimates (i.e., the maximum level of taxiing aircraft) were sound pressure levels between 41.4 and 43.3 dBA.

There is no "one size fits all" noise model, and the NorthLink project is no exception. Taxiing noise is seldom the subject of independent FAA noise analyses because taxiing noise is typically subsumed in the broader airport noise profile. Departures and arrivals, for example, generate significantly more noise than the noise generated by taxiing actions. The approved revised noise analysis was appropriate as applied to the anticipated taxiing activities.

The NorthLink cargo improvement project will not result in an increase in flights to/from the airport. As described in the Final EA, Existing Conditions, Section 1.0, Purpose and Need for the Proposed Action, Section 1.1.2, there is going to be an anticipated loss of hardstands. The NorthLink project will construct 15 hardstands. The project therefore is primarily in the nature of airport cargo improvements to already-existing TSAIA cargo facilities.

FAA Order 1050.1F, Appendix B, sets the significance threshold when the action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a 1.5 dB or greater increase,

[6] See Appendix D (Air Traffic Activity System (ATADS) excerpt). The Part 150 study forecasted 242,275 operations compared to an actual of 245,283 operations in 2020, and compared to an actual 277,121 operations in 2022 (not including the Lake Hood airbase).

[7] See Appendix D (Terminal Area Forecast).

when compared to the no action alternative for the same timeframe. The noise generated by taxiing events relating to the Airpark project area is not predicted to reach at or near the FAA threshold for noise.

Because the predicted aircraft taxiing noise does not meet FAA significance threshold standards, a redesign of the Airpark is not needed; no additional buffer zone is needed; and no berm modifications are required.

We have considered that 400hz ground electric power supply will be installed at each hardstand, generally eliminating the need for aircraft to run Auxiliary Power Units (APUs) while parked. Without ground power, cargo aircraft parked at the project site would need to run APUs, which are noisy and powered by jet fuel, to supply power. NorthLink's property lease allows ANC to restrict the use of APUs at the proposed facility in order to limit noise and air emissions. This was mentioned as one of the "assumptions" in the noise study.

Some public comments focused on noise in Kincaid Park. (See Section 4(f) above.) Kincaid Park is closer to the TSAIA East/West runway than will be the Proposed Action and therefore already is exposed to nearby airport noise. Kincaid Park is noted in the Final EA (3.2.1) as being located ¾ of a mile from the project. The boundary for Kincaid Park is separated from the Proposed Action by other Airport land, including a fire training pit and an active shooting range for law enforcement. The trail to Little Campbell Lake was mentioned in comments, with a request for an additional buffer zone. Little Campbell Lake trail was discussed in the Final EA (3.6.2) and is a part of Kincaid Park. (See also discussion below in "Visual Resources/Visual Character for more general background.) As noted above, the Kincaid Park and Campbell Lake areas are in the vicinity of the existing East/West runways and therefore are already subject to airport noise. The eastern part of Kincaid Park is within the 65 DNL. Project noise for the eastern part of Kincaid Park as depicted in the noise study is anticipated to be at or below 54 DNL.

The FAA does not have a significance threshold for construction noise. The construction noise impacts would be temporary in nature. Specifically, we may assume temporary noise impacts from the operation of heavy equipment, the presence of construction crews, and other associated construction activities. Those impacts are likely to fall within the existing 62 DNL and/or within the relevant 80 db hourly Leq identified in the Anchorage Noise Control Ordinance even at the closest noise receptor locations (most construction would take place at distances beyond 700 feet away). Even if temporary construction noise levels were higher than anticipated or took place outside normal working hours (such as on weekends, etc.), a Noise Permit would be required and could be conditioned as deemed appropriate by the Municipality of Anchorage as required for all construction projects in the Anchorage area. Abatement methods such as proper maintenance of construction equipment would help reduce these impacts.

Construction of the Project will not require alteration of local vehicle traffic or air traffic patterns, nor are long- term increases to traffic volume due to operations anticipated. Therefore, noise impacts related to such changes are not anticipated.

Visual Resources / Visual Character

The sources of lighting for the Proposed Action include flood and spot luminaires on 35 to 60- foot poles; flush taxilane lighting; and security lighting for the cargo warehouse and parking lot. The Proposed Action is not expected to have light impacts that substantially alter the character of the area; the proposed project area is on airport property adjacent the current South Airpark aviation facilities with existing light poles and facility security lighting. Light emissions already exist in the area and the addition of the

Proposed Action is not expected to interfere with normal activities. The Proposed Action is consistent with the land uses in the surrounding area. Project components such as the 60-foot lighting poles and the cargo terminal may be visible from the highest elevation homes in the neighborhood south of the project, however the new lighting sources are not expected to impact the daily activities of the residents of the adjacent neighborhood or patrons of Kincaid Park. The luminaires will be placed in a direction and at an angle that lights the infrastructure, not the surrounding area. Operations, including aircraft movements, and lighting impacts will largely be obscured to the residential neighborhood south of the project area by an approximately 25-foot-high barrier consisting of an earth berm topped with a vegetated buffer constructed to mitigate visual and noise impacts.

Vegetation clearing required for the Proposed Action will include the entire project area save for the portion of the project area south of the earth berm. The base of the berm is expected to be approximately 200 feet. South of the earth berm approximately 500 feet of vegetation will remain from the Proposed Action to Raspberry Road. The construction of cargo facilities is not expected to substantially change the character of the area because the vegetative buffer will remain on Raspberry Road in addition to the construction of an earth berm obscuring views of the facilities. Because of the 500 feet of vegetation and the 25-foot earth berm mitigation, the natural visual setting along Raspberry Road will not change. Portions of the Proposed Action, such as the 50 to 60-foot-tall cargo terminal and the 60-foot light poles may be visible to some residents at higher elevations in the adjacent neighborhood, however the cargo facilities will be consistent with the visual character of aviation infrastructure in the area. The project location is on airport property adjacent existing aviation facilities.

As described in Section 3.2 of the Final Environmental Assessment, the eastern portion of Kincaid Park including Little Campbell Lake is State of Alaska Airport Property. Kincaid Park is owned by the Municipality of Anchorage and begins west of Little Campbell Lake separated from the Proposed Action by almost three-quarters of a mile of mixed forest. The descriptions in the following paragraph are regarding the area of Kincaid Park that is State of Alaska owned, but managed by the Municipality of Anchorage as a portion of Kincaid Park.

The nearest trail is west of an access road to Little Campbell Lake. A walking survey was conducted on April 6, 2022, to assess potential visual impacts to patrons on the eastern-most trail, nearest the Proposed Action. Photos were taken from high points along the trail aimed east toward the project area (Photos 1-4 available in the Final EA). The photos show that during winter conditions a trail patron approximately 5.5 feet tall cannot see beyond approximately 300 feet. Summer conditions would be expected to further limit the sight distance with increased foliage as a visual buffer. Because the Proposed Action is over 1,000 feet from Kincaid Park and further from patron resources such as trails, no visual impact to Kincaid Park is expected.

Water Resources: Wetlands and Groundwater

The wetland habitat present within the project boundaries are not subject to any regulatory oversight as they do not meet the definition of waters of the US, per the Clean Water Act. No permit is needed to place fill or construct within their boundaries. The four discrete wetlands are not of sufficient size to effectively provide essential ecological services such as groundwater recharge, flood attenuation, or wildlife habitat.

The Proposed Action is not anticipated to encounter groundwater during excavation and construction of the hardstands and taxiways; direct impacts to groundwater are not expected. Geotechnical investigations

identified static water in the project area at minimum 42 feet below the ground surface (CRW 2022, Appendix F). Excavation is not expected to reach groundwater due to the relatively shallow nature of excavation activities. Based on geotechnical recommendations, excavation may reach a maximum of 25 feet below finished grade to dig out woody fill debris at that depth in the northeast portion of the project area. However, excavation to that depth may be avoided by the contractor as it may not be necessary. Light poles reach the lowest depth at 45 feet below finished grade, however the poles will be driven into the ground and no excavation will be required for the light poles. Excavation will not reach the groundwater depth of 42 feet. The construction of hardstands, taxilanes, and aprons would increase the amount of impervious surfaces within the project area, resulting in reduced groundwater recharge. No change to aquifer content is expected. Overall, the Proposed Action would have indirect negligible, long-term impacts on groundwater due to the addition of an impervious surface. The Proposed Action would not contaminate an EPA-designated sole source aquifer or its recharge area protected by the Safe Drinking Water Act as none occur in Alaska.

7. PERMITS AND APPROVALS

The following permits and approvals will be required prior to construction of the Proposed Action:

ADEC Construction General Permit for Storm Water Discharges for Large and Small Construction Activities (Clean Water Act [CWA] Section 402).

Alaska Department of Natural Resources State Historic Preservation Office Concurrence on Section 106 of the National Historic Preservation Act Findings.

8. ENVIRONMENTAL COMMITMENTS

The Proposed Action will adhere to all federal, state, and local laws. In addition, construction of the Proposed Action will include measures to avoid, minimize, and mitigate potential environmental impacts through standard operating procedures and best management practices. The following are proposed environmental commitments that arose from coordination with regulatory agencies. In addition to the environmental commitments the Proposed Action will adhere to all permit stipulations that may arise during the permitting process.

Environmental Topic	Commitment
Hazardous Materials	No soils will be excavated in the northwest portion of the project area nearest the active contaminated site AIA Fire Training Pit (ADEC Hazard ID 414). If excavation is required in the northwest corner of the project area, ADEC will be consulted.
Wetlands	Compensatory mitigation will be provided for unavoidable impacts to jurisdictional wetlands.
Historic, Architectural, Archaeological, and Cultural Resources	If cultural, archaeological, or historic resources are discovered during project construction, all work will proceed in the Inadvertent Discovery Plan, on file with the SHPO.

9. MITIGATIONS AND REGULATORY CONCURRENCE

The following mitigations are required for compliance and will be incorporated and formalized in a mitigation monitoring plan.

The sponsor's consultation with ADEC is documented in the Final EA and appendices. Actions related to contaminated materials have been reviewed and accepted by the ADEC. Therefore, the authority having jurisdiction has defined and recognized a state of conditional compliance under which the project has the legal authority to proceed. The FAA recognizes and accepts that authority.

The FAA notes the sponsor's agreement to adhere to the following conditions set forth in the consultation:

- Construction Work Requirements: Prior to ground disturbance of the site, sponsor and lease holder must coordinate with ADEC to ensure no interference with potential iterative ADEC sampling efforts.
- Immediate suspension of construction and a contaminated materials management plan (CMMP), approved by ADEC, including a sampling plan, will be required in the event contaminated materials are found above ADEC cleanup levels (results as derived from ongoing, iterative ADEC sampling) in the area to be disturbed during construction.
- Any changes to the project pursuant to a final CMMP, if required, must be verified for consistency with the analysis in the Final EA.

10. PUBLIC PARTICIPATION

NorthLink Aviation, and its predecessor IC Alaska Airport LLC, began public outreach in December 2020 to inform the public about proposed developments to the NorthLink Lease Lot. Public involvement included regular meetings with the local community council, a public meeting, posting fliers near the project area informing the public and soliciting comments, newspaper advertisements, public notice on the FCC website, email, a project website, and publishing technical reports for review and comment. Meetings between NorthLink and the Sand Lake Community Council Sub-committee occurred:

1. December 8, 2021 (In person and virtual)
2. December 14, 2021 (Virtual)
3. January 5, 2022 (Virtual)
4. January 18, 2022 (Virtual)
5. February 2, 2022 (Virtual)
6. February 7, 2022 (Virtual)
7. March 9, 2022 (Virtual)
8. September 12, 2022 (In person)
9. April 10, 2023 (In person and virtual)

The Sand Lake Community Council (SLCC) has been afforded additional opportunities to address concerns. The SLCC adopted a non-binding resolution on December 14, 2020, asking that the developers of the Proposed Action work closely with a committee consisting of members of the Sand Lake Community on the development, including ensuring that the design of the proposed project include a setback from Raspberry Road, a berm to dampen noise and the visual impact of the project, and utilize an existing road (South Airpark) to access the terminal. In response to this non-binding resolution, NorthLink Aviation has coordinated closely with a sub-committee of the SLCC to address concerns and provide background on specific elements of the Proposed Action, including the NEPA process. Although not formal outreach, some community organizations, such as the Nordic Ski Association of Anchorage and Anchorage Amateur Radio Club, have informed and/or sought comments from their membership. The Draft Environmental Assessment (Draft EA) was also available for review or download on the NorthLink Aviation website. Comments on the Draft EA were received primarily by email and also at one public open house (June 2, 2022). Public input resulted in changes to the project and to the Draft EA primarily in the sections on Hazardous Materials, Noise, Visual Resources, and Water Resources. Commenters shared concerns regarding impacts to the Sand Lake area neighborhoods and to Kincaid Park. In particular, commenters were concerned about noise impacts to the neighboring residential community and the possibility of the Proposed Action contaminating the residential wells. As discussed above, the complaints about noise resulted in further inquiry by the FAA about the NorthLink noise study and certain targeted modifications to the noise study that had been appended to the Final EA for public comment. The FAA ultimately reviewed and approved the NorthLink noise study now appended as Exhibit D. A summary of all public comments can be found in Appendix G of the Final EA.

11. INTER-AGENCY COORDINATION

On behalf of the FAA, agency scoping for the project was conducted February 17, 2022, through March 31, 2022. Scoping letters describing the project and soliciting information were sent to the appropriate state and federal agencies, tribal organizations, and other entities. Additionally, agencies offered comment on the Draft EA and additional coordination with ADEC is documented in Appendix H. Section 5.2 of the Final EA outlines agency comment and response and all coordination letters and agency comments are provided in Appendix H of the Final EA.

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

12. REASONS FOR DETERMINATION THAT THE PROPOSED ACTION WILL HAVE NO SIGNIFICANT IMPACT

The attached Final EA examines each of the various environmental resources that were determined to be present at the project location, or had the potential to be impacted by the Proposed Action. The

Proposed Action would not cause any environmental impacts that exceed any thresholds of significance as defined by FAA Orders 1050.1F and 5050.4B. Based on the information contained in the Final EA, the FAA has determined that the Proposed Action meets the purpose and need for the Proposed Action, would not cause any significant environmental impacts that cannot be mitigated, and is the most reasonable, feasible, and prudent alternative. Accordingly, the FAA has decided to approve the Proposed Action as it is described in Section 3 of this FONSI/ROD.

The Proposed Action does not exceed significance thresholds for Section 4(f) properties, defined as when an action's physical use of a Section 4(f) resource would be more than minimal, or its constructive use substantially impairs the 4(f) property. The Proposed Action will not permanently incorporate land from a 4(f) protected property, nor will the Proposed Action temporarily use land from a 4(f) protected property.

As to hazardous substances, ADEC has been engaged during the preparation of the environmental analysis and has undertaken sampling efforts both on-airport, and off-airport. Part of ADEC's sampling efforts were directly in response to neighborhood concerns. Particular focus was placed on the PFAS analysis, and groundwater in the neighboring community was either no detect or below action levels.[8] On the project site, the surface testing revealed PFAS below action levels. The situation at the neighboring fire training pit was considered and excavation activities are not anticipated near that site. The actual excavation will be at depths that are not close to impacting ground water. ADEC recently clarified that it awaits results of other sampling on the NorthLink Lease Lot.[9] While ADEC does not anticipate any results to prevent construction, in the event of unexpected sampling results, a CMMP would be required. Based on information obtained to date, ADEC does not object to construction proceeding.

There have otherwise been no factors triggering a significance threshold per Exhibit 4-1 of the FAA Order 1050.1F. Thus, and for example, the Final EA considers the undeveloped nature of the project area, and the kinds of hazardous materials likely to be generated during construction (fuel, lubricants, and so on). Stormwater discharges are considered. Treatment of glycol is discussed at length and the associated glycol recovery and recycling facility. Potential future deicing activities are considered.

The Proposed Action does not exceed significance thresholds for Historical, Architectural, Archaeological, and Cultural Resources. Factors to consider when making significance determination include a finding of *Adverse Effect* through the Section 106 process. A Findings Letter was sent to the State Historic Preservation Office (SHPO) on May 6, 2022, requesting a finding of *No Historic Properties Affected*. The SHPO responded with a concurrence letter agreeing to a finding of *No Historic Properties Affected* on May 12, 2022. Appendix C of the Final EA shows Section 106 documentation.

The Proposed Action does not exceed significance thresholds for noise defined as an increase in noise by DNL 1.5 dB or more for a noise-sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level or greater increase, when compared to the no action alternative for the same timeframe. NorthLink's FAA-approved noise analysis conducted for the Proposed Action found operation of the facility, including taxiing of multiple aircraft

[8] ADEC letter, February 22, 2023.

[9] "ADEC contractors also plan to take additional samples in the NorthLink lease area." (ADEC April 11, 2023)

simultaneously, will not result in significant noise impacts (Appendix D). The DNL from Airpark operations, including both sound level and length of time spent taxiing, are predicted to be 53 dBA. The noise level at the eastern entrance to Kincaid Park as depicted in the 2015 Part 150 noise study was 54 dBA (see 4(f) analysis section above and CadnaA contour modeling in the FAA approved noise plan). To further decrease noise due to Airpark operations, the Proposed Action proposes to construct a 25-foot earthen berm.

Temporary noise impacts may result from the operation of heavy equipment, the presence of construction crews, and other associated construction activities. Abatement methods such as proper maintenance of construction equipment would help reduce these impacts. Construction of the Proposed Action will not require alteration of local vehicle traffic or air traffic patterns, nor are long-term increases to traffic volume due to operations anticipated. Therefore, noise impacts related to such changes are not anticipated.

The Proposed Action does not exceed significance thresholds for light emissions or visual resources/character defined as creating annoyance or interference with normal activities from light emissions; affecting the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; contrast with the visual resources and/or visual character in the study area; and blocking or obstructing the views of visual resources, including whether these resources would still be viewable from other locations. Light emissions already exist in the area and the addition of the Proposed Action is not expected to interfere with normal activities. The Proposed Action is consistent with the land uses in the surrounding area. Project components such as the 60-foot lighting poles and the cargo terminal may be visible from the highest elevation homes in the neighborhood south of the Proposed Action, however the new lighting sources are not expected to impact the daily activities of the residents of the adjacent neighborhood or patrons of Kincaid Park. The luminaires will be placed in a direction and at an angle that lights the infrastructure, not the surrounding area. Operations, including aircraft movements, and lighting impacts will largely be obscured to the residential neighborhood south of the project area by an approximately 25-foot-high earth berm topped with a vegetated buffer constructed to mitigate visual and noise impacts.

The Proposed Action does not exceed significance thresholds for wetlands as there are no jurisdictional wetlands and the four discrete non-jurisdictional wetlands are not of sufficient size to effectively provide essential ecological services such as groundwater recharge, flood attenuation, or wildlife habitat. The Proposed Action does not exceed significance criteria for groundwater as action is not anticipated to encounter groundwater during excavation and construction of the hardstands and taxiways; direct impacts to groundwater are not expected. Geotechnical investigations identified static water in the project area at minimum 42 feet below the ground surface (CRW 2022, Appendix F). Excavation is not expected to reach groundwater due to the relatively shallow nature of excavation activities. Based on geotechnical recommendations, excavation may reach a maximum of 25 feet below finished grade to dig out woody fill debris at that depth in the northeast portion of the project area. However, excavation to that depth may be avoided by the contractor as it may not be necessary. Light poles reach the lowest depth at 45 feet below finished grade, however the poles will be driven into the ground and no excavation will be required for light poles. Excavation will not reach the groundwater depth of 42 feet. The construction of hardstands, taxilanes, and aprons would increase the amount of impervious surfaces within the project area, resulting in reduced groundwater recharge. No change to aquifer content is expected. Overall, the Proposed Action would have indirect negligible, long- term impacts on

groundwater due to the addition of an impervious surface. The Proposed Action would not contaminate an EPA-designated sole source aquifer or its recharge area protected by the Safe Drinking Water Act as none occur in Alaska.

13. FEDERAL FINDING AND APPROVAL

Based on the information in this FONSI/ROD and supported by detailed discussion in the Final EA, the FAA has selected the Proposed Action as the Selected Alternative. The FAA must select one of the following choices:

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

Approval signifies that applicable federal requirements relating to the proposed airport rehabilitation and planning have been met. Approval would allow Ted Stevens Anchorage International Airport to amend its Airport Layout Plan and allow NorthLink Aviation to proceed with implementation of the Proposed Action. Disapproval would prevent ANC from amending its Airport Layout Plan and prevent NorthLink from implementing the Proposed Action.

Under the authority delegated to me by the Administrator of the Federal Aviation Administration, I find that the project is reasonably supported. I, therefore, direct that action be taken to carry out Ted Stevens Anchorage International Airport and NorthLink Aviation's actions outlined in Section 3 of this FONSI/ROD. As a condition of this FONSI/ROD, NorthLink Aviation and, where appropriate, Ted Stevens Anchorage International Airport shall implement all the environmental commitments identified in the Final EA.

I have carefully and thoroughly considered the facts contained in the Final EA. Based on that information, I find the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act (NEPA) and other applicable environmental requirements. I also find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA will not prepare an Environmental Impact Statement for this action.

APPROVED:

KRISTI A WARDEN Digitally signed by KRISTI A WARDEN Date: 2023.08.16 13:37:10 -08'00'

Kristi A. Warden **Date**

Division Director

Airports Division, Alaska Region

DISAPPROVED:

Kristi A. Warden **Date**

Division Director

Airports Division, Alaska Region

RIGHT OF APPEAL

This FONSI/ROD constitutes a *final order of the FAA Administrator and is subject to exclusive judicial review under 49 USC 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing* a *petition for review in the appropriate*

U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 USC 46110.